

HENKEL CORPORATION

ILD 005215769

TABLE OF CONTENTS

Section	<u>Page</u>			
Location				
Current Operations				
History	3			
Permitting Status/Hazardous Materials				
Aerial Photographs				
SWMU Identification				
Compliance History				
Visual Site Inspection				
Site Releases/Sampling				
Targets	29			
Summary of Suggested Further Actions				
Site Map				
Facility Photographs				
Preliminary Assessment Form	53			
Supporting Documentation	57			
APPENDICES				
A Illinois Location Map	A-1			
B Site 4-Mile Radius Map	B-1			
C 15-Mile Surface Water Map	C-1			
D Wind Rose	D-3			



TABLE OF CONTENTS

Section	<u>Page</u>	
Location	2	
Current Operations	2	
History	3	
Permitting Status/Hazardous Materials	3	
Aerial Photographs	4	
SWMU Identification	7	
Compliance History	29	
Visual Site Inspection	29	
Site Releases/Sampling	29	
Targets	29	
Summary of Suggested Further Actions	32	
Site Map		
Facility Photographs	34	
Preliminary Assessment Form	53	
Supporting Documentation	57	
APPENDICES		
A Illinois Location Map	A-1	
B Site 4-Mile Radius Map	B-1	

Location

Henkel Corporation, is located about 1/2 mile south-southwest of the city limits of Kankakee in Kankakee County, IL. The facility address is P.O. Box 191, So. Kensington Road, Kankakee, IL 60901. Henkel Corporation's facility and surrounding land occupies 193.35 acres in the NW1/4 of Section 18, Township 30 N, Range 13 W.

The facility is located in an area which is both agricultural and industrial/commercial. Henkel Corporation is bound on the north by Kankakee Garden Farms and the Yonke Estate, on the east by So. Kensington Road and the Illinois Central Gulf R.R., beyond which is the A.O. Smith Corporation and another company, on the south by Dow Chemical and more of the Yonke Estate (farm ground), and on the west by still more farm ground. So. Kensington Road provides access to Henkel Corporation and its neighbors east of the R.R. A.O. Smith Road will access the facility from the east via Route 52/45. The closest residence with a private well is approximately one quarter mile southwest of the Henkel Corporation plant.

Current Operations

The Henkel Corporation Kankakee plant is a manufacturer and distributor of specialty chemicals. The chemicals are produced from naturally occurring raw materials and are used by a wide variety of industries. The facility employs approximately 398 people.

The Kankakee plant produces dimer acids, polyamide resins, fatty nitrogen compounds, vitamin E, sterols, and starch based compounds. The polyamide resins are produced by combining a dimer or monomer fatty acid with either a functional or polyfunctional amine to form an amide. polyamide products are sold to industries that formulate inks, coatings, paints and adhesives. The fatty nitrogens are produced either from nitriles or primary amines. of these products are liquids and as such, are shipped via drum or tank truck for use in cosmetics, corrosion inhibiters, in oil well drilling and with other applications. The mineral chemicals are normally amines produced from fatty These products are used primarily by food and alcohols. mining industries for the purpose of extraction. All of these products are liquid and as such are shipped in drums and tank trucks. The fine chemicals consist of two main products, vitamin E and sterols are produced from waste distillate from the vegetable oil industry.

The plant complex consists of numerous above ground tanks and many buildings. The south half of the complex is their industrial chemicals portion producing the resins and adhesives while the north half produces the fine chemicals

such as natural source vitamin E and food additives. The plant utilizes approximately 50 of the 193.35 acres owned by Henkel Corporation, the remaining acreage is leased for farming.

History

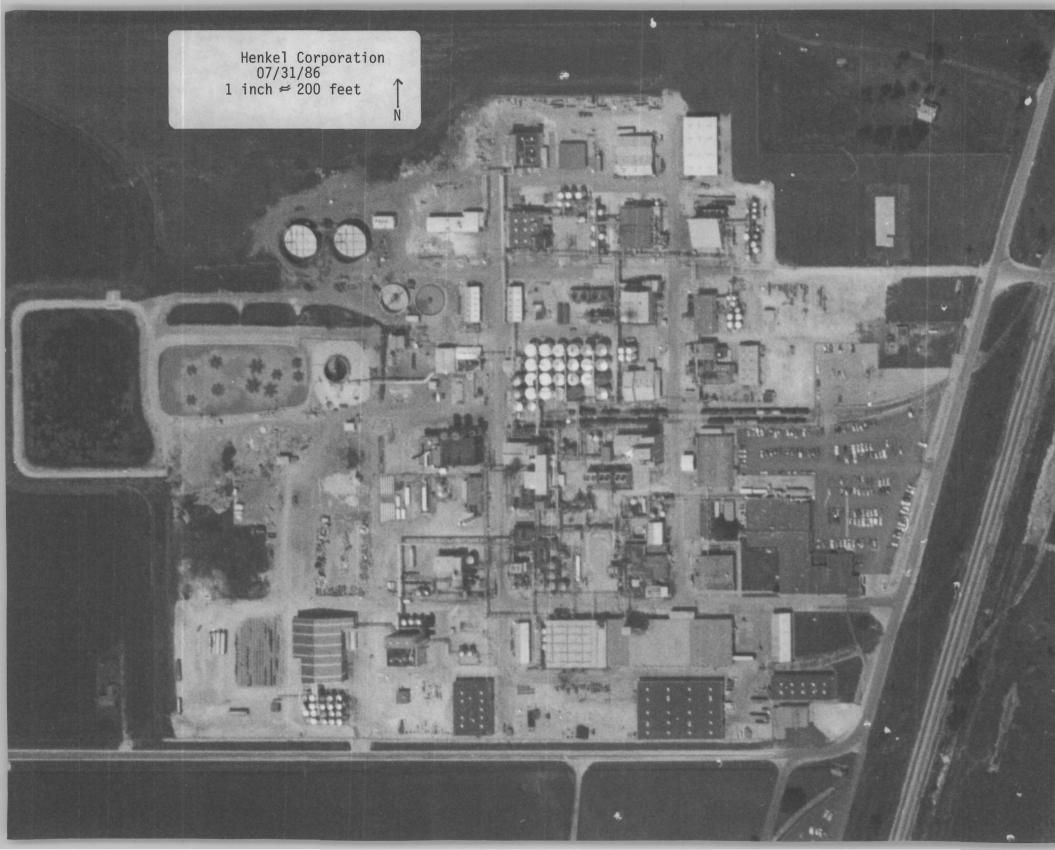
The plant began operations on October 1, 1948 as General Mills Chemicals. On September 1, 1977, the plant was purchased by Henkel Corporation. Most of the operations at Henkel Corporation have evolved from operations conducted while General Mills Chemicals owned the plant. It can be deducted from the attached aerial photographs that waste handling procedures have dramatically changed over the years of operation. The 1963 photo shows the entire west end of the facility being used as a landfill and/or lagoon.

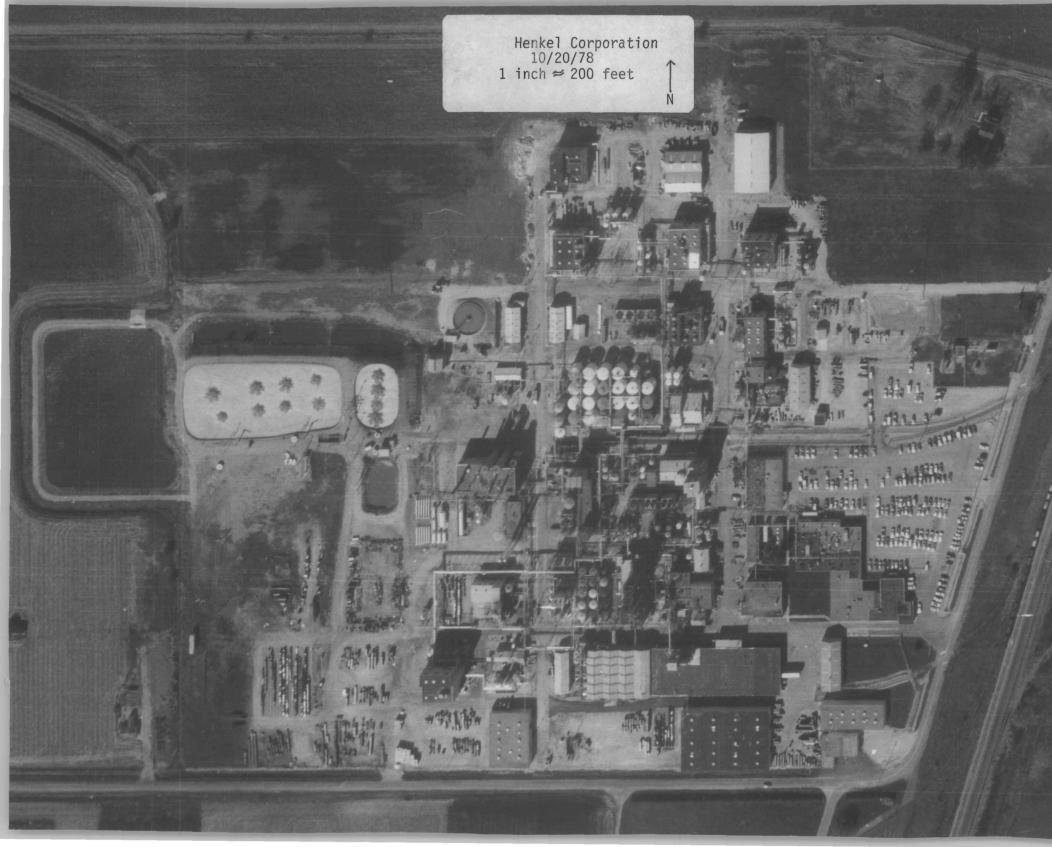
Permitting Status/Hazardous Materials

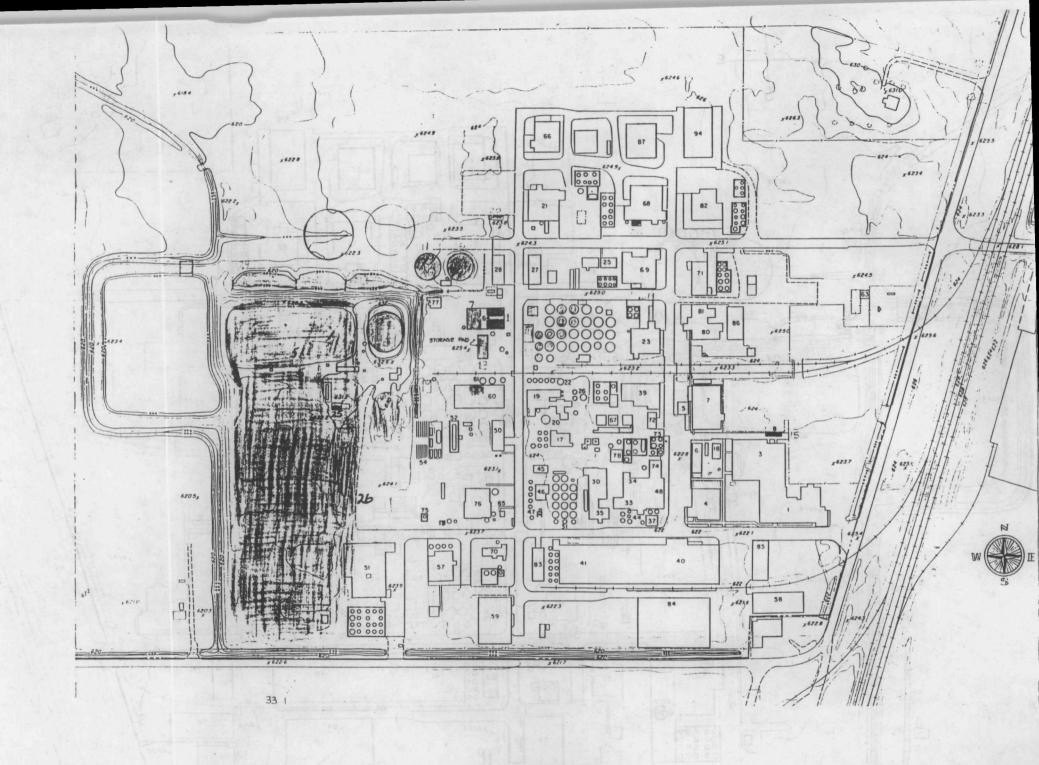
Henkel Corporation filed their RCRA Part A on November 18, 1980 which included a 335,175 gallon container storage area (S01), a 698,300 tank storage area (S02), a 1.5 MGPD waste water pretreatment plant (T04), and a 129,600 GPD thermal treatment unit (T04). The latter T04 consisting of two process/heating steam boilers used to burn waste oil with natural gas. The estimated annual quantity of waste was reported as 59,410 pounds of U-listed wastes, 168,837,050 pounds of D-listed wastes and 204,600 pounds of F-listed wastes.

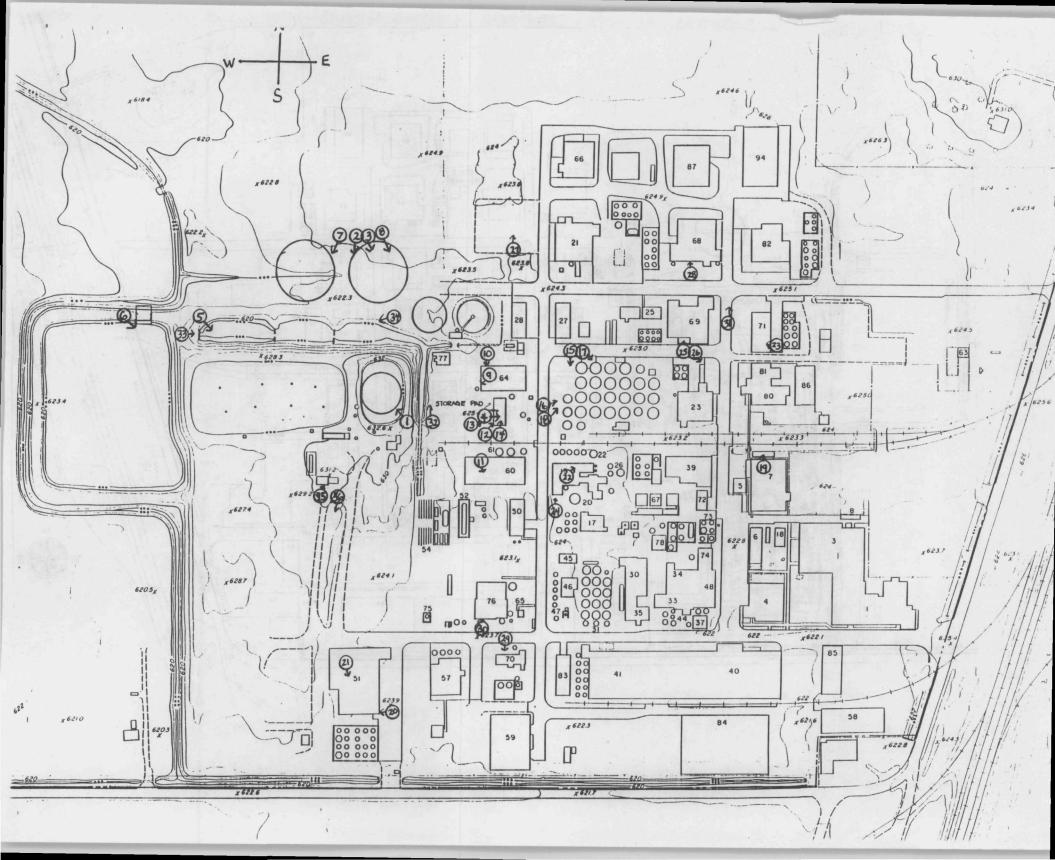
Henkel Corporation submitted their RCRA Part B permit application May 27, 1983. IEPA issued several NOD's with the final permit due April 15, 1991.

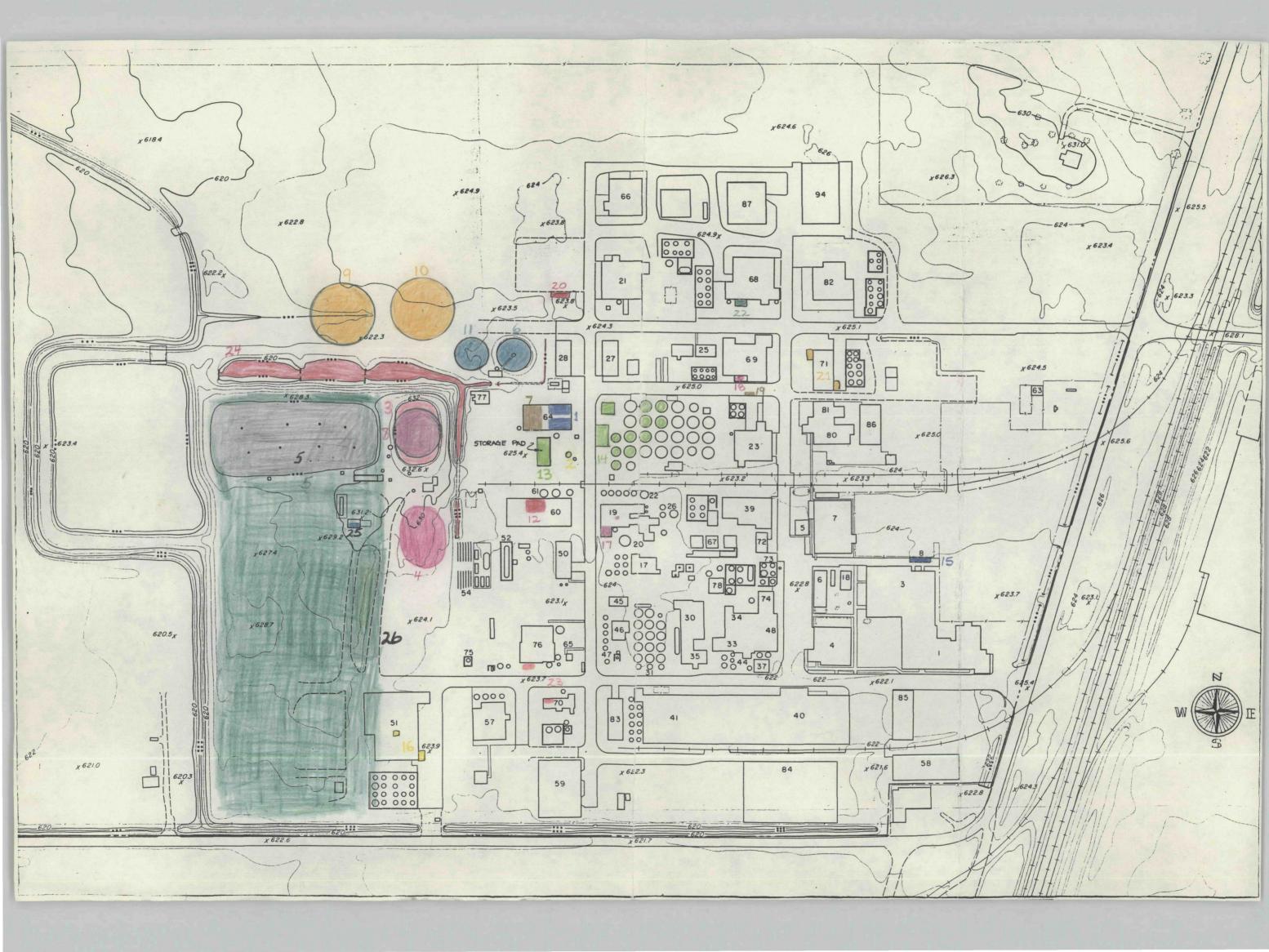








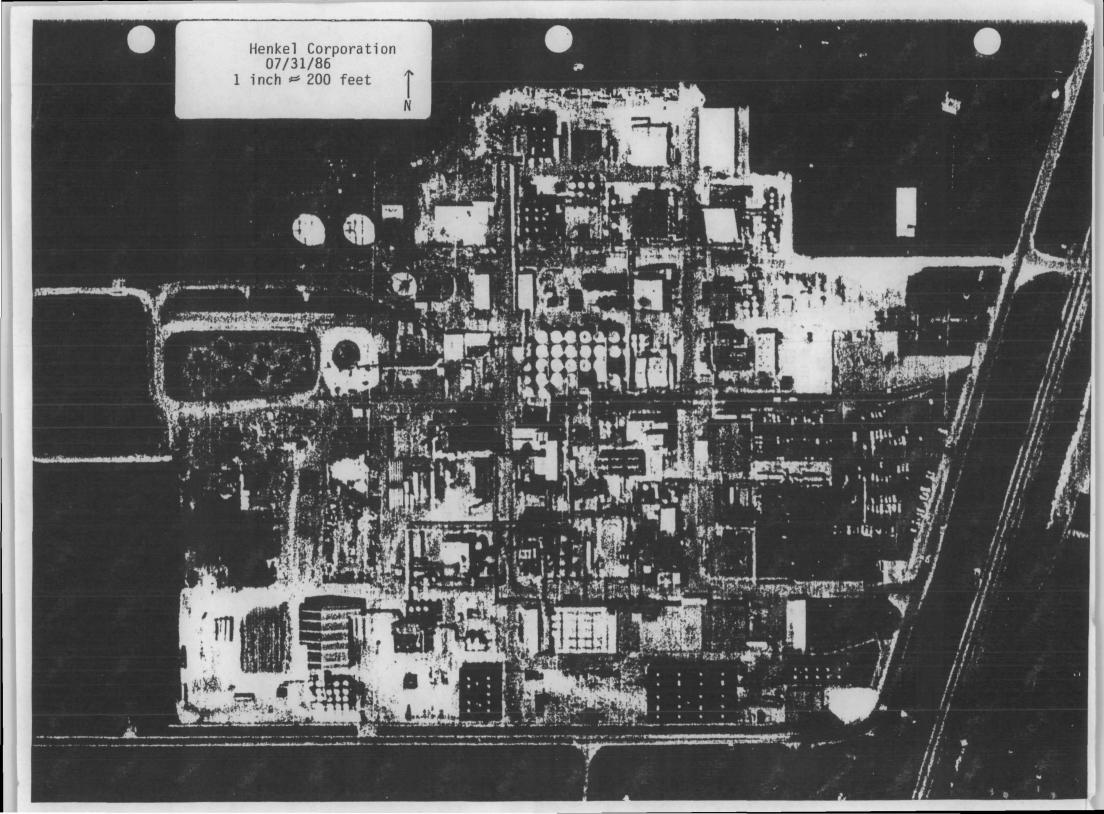




SWMU Identification

After review of IEPA files, conversations with the state RCRA permit staff and a Visual Site Inspection, 26 Solid Waste Management Units (SWMU's) were identified at Henkel Corporation. The SWMU's consist of the following:

- #1 Primary Treatment, Area #64
- #2 Waste Oil Storage Tank, Area #64
- #3 750,000 Gallon Lagoon #1
- #4 650,000 Gallon Lagoon #2
- #5 3,500,000 Gallon Lagoon #3
- #6 55' Concrete Secondary Clarifier
- #7 Sludge Filter Press
- #8 Primary Clarifier
- #9 Westernmost Aeration Basin
- #10 Easternmost Aeration Basin
- #11 Westernmost Secondary Clarifier
- #12 Boiler House, Area #60
- #13 Container Hazardous Waste Storage Pad
- #14 Waste Oil Tank Farm, Area #11
- #15 Laboratory Satellite Storage Pad, Area #3
- #16 Versacure Satellite Waste Storage Pad And Bag House, Area #51
- #17 Polymer Plant Bulk Waste Storage, Area #19
- #18 Hazardous Waste Storage Tank, Area #69
- #19 Waste Tar Tank, Area #69
- #20 Bulk Waste Storage, Area #26
- #21 Acrylics Satellite Waste Storage Pads, Area #71
- #22 Vitamin E Satellite Waste Storage Pad, Area #68
- #23 Spent Palladium Storage Pads, Areas #70 & #76
- #24 Facility Storm Drainage System
- #25 Refuse Compactor and Dumpster
- #26 Old Landfill/Lagoon Area, West Side of Facility



SWMU's #1 - #11: Wastewater Pretreatment Plant, Areas #64 and #98 (photographs #1 - #10)

Unit Description:

The old pretreatment plant consisted of primary treatment in two 15,000 gallon pits (SWMU #1). Located in the building at area 64, the two concrete pits where and still are used to skim off 75-90% of the floating oils. SWMU #2 is located in area #64 where an 8,500 gallon tank (64 Z-1) was used to store the waste oil prior to burning in 2 boilers. After pH adjustment, the wastewater entered lagoon #1 (SWMU #3) with a 750,000 gallon capacity and 4 - 50 hp floating aerators. Gravity flow into the 3,500,000 gallon lagoon #3 (SWMU #5) followed with extended aeration via 8 -500 hp floating models. From lagoon #3, the wastewater went to a concrete, 230,000 gallon (55' diameter) clarifier (SWMU #6) for solids reduction. Underflow solids were either sent back to lagoon #1 or went to the filter press (SWMU #7) for dewatering. The sludges are stored in open, 15 cubic yard boxes next to the filter press, prior to disposal at either Milford or Kankakee landfill. the lift station, the effluent was pumped to the Kankakee sewer system/POTW.

South of Lagoon #1 was another lagoon with dimensions of 85 foot by 110 foot. Lagoon #2 (SWMU #4) was used for aeration until the late 1960's.

The new pretreatment plant consists of a new 175,000 gallon primary clarifier (SWMU #8 - built on top of SWMU #3 aka lagoon #1), 2 aeration basins (SWMU's #9 and #10) and an additional secondary clarifier (SWMU #11). Waste oils are still skimmed off at the old primary clarifier (SWMU #1) before the wastewater enters the new unit (SWMU #8). Also, the waste oils are still stored at SWMU #2 prior to being shipped to either Beaver Oil in Joliet, IL. or Breslube in E. Chicago, IN.

Age of Unit:

The old pretreatment plant began operations in 1972, the new plant took over in 1986. According to Henkel Corporation, the Kankakee POTW has served

Henkel Corporation/General Mills Chemicals since its inception in 1947.

Date of Closure:

The new unit is active with no anticipated date of closure. According to Henkel Corporation, . . May of 1986, Lagoon #1 (SWMU #3) was lilled in with sand, upon which was built the new primary clarifier (SWMU #8). Lagoon #2 (SWMU #4) was backfilled sometime in the late 1960's. Lagoon #3 (SWMU #5) was filled in October of 1986.

Wastes Managed:

The sources of wastewater include those from chemical processes, boiler and cooling tower blow-downs, floor washings, loading and unloading pad spills and washings, plant sanitary waste, and some water from road and roof drains. Normal flow through the plant is 1 MGPD. Current wastewater contain trace solvents such as hexane, toluene, acetone, ethylene dichloride and isopropanol. IEPA has classified the water, dirt and sludge as special waste that is generated at a yearly rate of about 7200 cubic yards.

The waste oil skimmed off of SWMU #1 is 85-90% vegetable oil and 10-15% slop oils and is classified as a special waste.

Release Controls: Overflows from the clarifiers are diverted to the lift station and pumped to the Kankakee sewer system/POTW.

History of Release:

The Division of Air Pollution has recorded numerous complaints of noxious smells coming from the facility and particularly the pretreatment plant. A groundwater release from the old lagoon system was not proved with the students t-test although groundwater mounding was observed around the lagoons during the monitoring in 1983.

Conclusions:

Soil/Groundwater: The release potential to soil or groundwater is high due to the prior use of an unlined lagoons in the pretreatment process.

Surface Water: The release potential to surface water is high due to the proximity of an adjacent drainage ditch.

<u>Air:</u> The release potential to air is high due to the volatile organic constituents of the wastes managed.

<u>Subsurface</u> <u>Gas:</u> The potential for the generation of subsurface gas is low due to unit design.

Unit Description: The boiler house is where the process

steam is produced. Two Brooks Boilers used fuel oil and waste oil to fire the units. The waste oil was pumped via 6" overground piping from SWMU #2 in area #64 (tank 64 Z-1), and also from area #11, where an additional 10 tanks stored waste oil generated from the vitamin E production (SWMU #14). Both the waste oil

production (SWMU #14). Both the waste oil from skimmed at area #64 and the waste oil

from area #11 are of the same nature.

Age of Unit: Boilers #1 and #2 were purchased from the

military in 1946. Waste oils were burned in the boilers from 1976 to 1986. Two additional boilers were obtained in 1967 (Boiler #3) and 1976 (Boiler #4) although these were gas-fired and not used to burn

waste oils.

Date of Closure: The boilers stop burning waste oil in

1986.

Wastes Managed: Waste oil contained 10-15% slop oils and

85-90% vegetable oil distillate. The feed rate was 7.5 pounds of waste oil per gallon. According to the RCRA Part A.

129,600 gal/day were treated for fuel

recovery.

Release Controls: Spills would have been routed to the

drains which go to the WWTP.

History of There is no documented releases from

Releases: this unit.

Conclusions: Soil/Groundwater: The release potential

to soil or groundwater is low due to unit

design.

<u>Surface Water:</u> The release potential to

surface water is low due to unit design.

<u>Air:</u> The release potential to air is moderate due to the possibility of incomplete combustion of the waste oil.

<u>Subsurface</u> <u>Gas:</u> The potential for the generation of subsurface gas is low due to

unit design.

SWMU #13: Container Hazardous Waste Storage Area
(photographs #4, #12 - #14)

Unit Description: The 9-inch thick reinforced concrete

pad has dimensions of 30 foot by 100 foot, with a load bearing capacity of 4,500 lbs. The pad is divided into 4 areas to store separate incompatible wastes.

Age of Unit: Wastes have been stored at this area since

1982. The pad was constructed in the

spring of 1982.

Date of Closure: The unit is active with no anticipated

date of closure.

Wastes Managed: Quality control samples, proprionic acid,

miscellaneous solvents, resins, etc.; acidic nitrobenzene, acidic acetonitrile; acrylonitrile/carbon - filters; starch

gel/methanol; ethylene

dichloride/sterols/vitamin E; methylene

chloride; acrylic resin/xylene;

solvent/resins; vitamin E/acetone/clay;
chloroform/carbon - filters; miscellaneous
solvents -isopropanol, toluene, xylol,

etc.; and sodium aluminate. The wastes are listed as D001, D002, F003, and F005. Acidic nitrobenzene, F004, is no longer

generated as of October, 1989.

Release Controls:

The aggregate surface course starting at the west end of the concrete pad is sloped to drain away from the edge so that run-on of rain water will not be a problem. The concrete storage area slopes toward a collection sump on the east edge with a slope of 2.13%. The collection sump along with the sloped curbed storage area provides a holding capacity of 544 cubic

feet or 4,070 gallons.

History of Releases:

There is no documented releases from this unit, but there were stains on the concrete surface. The storage area and sump is in good condition, free of any

gaps, holes or cracks.

Conclusions:

<u>Soil/Groundwater:</u> The release potential to soil or groundwater is low due to unit design.

<u>Surface Water:</u> The release potential to

surface water is low because of the units design.

<u>Air:</u> The release potential to air is low because the wastes are stored in sealed drums.

<u>Subsurface Gas:</u> The potential for the generation of subsurface gas is low due to unit design.

SWMU #14: Waste Oil Tank Farm Area #11 (photograph #15 - #18)

Unit Description:

Ten of thirty-three tanks were designated for storage of waste oil in area #11 of the facility. The tanks range from 7,500 gallons to 84,000 gallons. Tanks Z-1, Z-3, Z-4, A-1, A-2, B-2, B-3, B-4, C-3 and C-4 totaling 698,300 gallons were listed in the Part A as storage tanks for waste oil. Fuel oil, mineral acid and raw material feed for the vitamin E process are stored in the remaining tanks. Currently, only the 7,500 gallon, cone bottom tanks, Z-3 and Z-4 are used for waste oil storage. Waste oils are drummed and stored on the west side of the tank farm. Just north of the drummed oil waste is another area of drummed tank bottoms.

Age of Unit: Waste oils have been stored in the tanks since the facility first started in 1947.

Date of Closure: Other than Z-3 and Z-4, most of the tanks are now used to contain product. Tank B-4, a 84,000 gallon tank is labeled as a waste oil tank.

Wastes Managed: Waste oil containing 85-90% vegetable oil distillate and 10-15% slop oils classified as a special waste.

Release Controls: There are no secondary release controls. The tanks are on a gravel base.

History of This unit may have contaminated soil at the pipe coupling areas, and where the drums are filled under the cone bottom tanks.

Conclusions: <u>Soil/Groundwater:</u> The release potential to soil or groundwater is high.

<u>Surface Water:</u> The release potential to surface water is moderate due to the possibility of the waste entering the storm sewer drain.

<u>Air:</u> The release potential to air is low to moderate due to the low volatile organic constituents of the wastes.

Subsurface Gas: The potential for the

generation of subsurface gas is low due to waste constituents.

Unit Description: In area #3, adjacent the Henkel's offices,

is a large laboratory which is used to physical test and quality check products. On the north side of the laboratory is an 8 foot by 45 foot covered storage pad, floored with a concrete pad. The

satellite waste storage pad is used to store lab chemicals as well as lab wastes.

Age of Unit: The unit has been used since approximately

1980.

Date of Closure: The laboratory and pad are presently

in use with no anticipated date of

closure.

Wastes Managed: Miscellaneous solvent and resin wastes

(F003, F005 and D001). Waste are

generated from this unit at about 30 - 55

gallon drums per year.

Release Controls: The wastes are contained in drums with no

secondary containment.

History of There is no documented or visual evidence

Releases: of a release from this unit.

Conclusions: Soil/Groundwater: The release potential

to soil or groundwater is low do to unit

design.

<u>Surface Water:</u> The release potential to

surface water is low due to unit design.

<u>Air:</u> The release potential to air is moderate due to the volatile organic constituents of the wastes managed.

<u>Subsurface</u> <u>Gas:</u> The potential for the generation of subsurface gas is low due to

unit design.

SWMU #18 Hazardous Waste Storage Tank, Area #69 (photograph #25)

Unit Description:

The methylation process occurs in area #69 where product from area #17 is methylated to form vitamin E. In addition to the feed, light solvents, an acid and an alkali are used in the process. hazardous waste generated is a concentrated tin liquor that is stored in a 10 foot diameter tank at the area. tank capacity is 8000 gallons and is located approximately 400 yards west of the property line in area #69.

Age of Unit:

The methylation process stared in 1970 and the tank unit has been used since the mid 1970's.

Date of Closure: The unit is active with no anticipated date of closure.

Wastes Managed:

The wastes concentrated tin liquor is listed as D002. About 68,072 gallons is generated per month, which goes out in bulk shipment to be incinerated at either M & T Chemicals in Carrollton, KY or Mason Metals in Sherrerville, IN.

Release Controls:

The diked area around the tank is in good condition and is capable of containing 100% of the tank volume.

History of

There is no documented evidence of a Releases: release from this unit.

Conclusions:

<u>Soil/Groundwater:</u> The release potential to soil or groundwater is high due to unit design.

Surface Water: The release potential to surface water is high due to unit design.

Air: The release potential to air is moderate due to the volatile nature of trichloroethylene.

Subsurface Gas: The potential for the generation of subsurface gas is moderate.

SWMU #19 Waste Tar Tank, Area #69 (photograph #26)

Unit Description: Another by product of vitamin E production

at area #69, is a neutralized tin liquor tar. This special waste is stored across from SWMU #18 in a 5 foot diameter rolloff tank supplied by KID Disposal (Waste Management, Inc.), which operates the

Kankakee Landfill.

Age of Unit: The waste was drummed from 1970 until 1983

when bulk storage started.

Date of Closure: The unit is active with no anticipated

date of closure.

Wastes Managed: The three material components of the

neutralized tin liquor tar include: tall oil fatty acid, phyto residue, and sodium

hydroxide. About 7,700 gallons are generated per month which is disposed of

at either Multi-Co. Landfill, Inc. or the Kankakee Landfill.

Release Controls: There is no secondary containment, however

the tank is set on a concrete area.

History of There is no documented evidence of a

Releases: release from this unit.

Conclusions: Soil/Groundwater: The release potential

to soil or groundwater is low due to unit

design.

<u>Surface Water:</u> The release potential to surface water is low due to unit design.

Air: The release potential to air is

low due to the stability of the tar.

<u>Subsurface</u> <u>Gas:</u> The potential for the generation of subsurface gas is low.

Unit Description: A large roll-off box is used to store

a special waste generated at area #26.

Age of Unit: In 1976, the old flaker was in use and in

1984 a new building was exected.

Date of Closure: The unit is active with no anticipated

date of closure.

Wastes Managed: The waste is described as melt tank

cleanings which have material components of sterols, sand and rock, dirt, water, wood debris, glass and scrap metal. About 100 cubic yards is generated per year that is bulk shipped as special waste to Multi-

Co. Landfill, Inc., of IL.

Release Controls: There is no secondary containment.

History of There is no documented evidence of a

Releases: release from this unit.

Conclusions: <u>Soil/Groundwater</u>: The release potential

to soil or groundwater is high due to unit

design.

<u>Surface Water:</u> The release potential to surface water is high due to unit design.

Air: The release potential to air is

low due to the stable nature of the waste.

<u>Subsurface Gas:</u> The potential for the generation of subsurface gas is moderate.

SWMU #21 Acrylics Satellite Waste Storage Pads, Area #71 (photograph #23 & #31)

Unit Description: In area #71, acrylic monomers are combined

with solvents to form acrylic coating materials. A 10 foot by 10 foot, concrete satellite storage pad is used to store the

solid wastes generated by the process.

Age of Unit: The unit has been used since the early

1970's.

Date of Closure: The unit is active with no anticipated

date of closure.

Wastes Managed: The solid waste is an acrylic mixed with

xylene. The waste is classified as D001 and generated at about 4 drums per month. The drums are transferred to SWMU #13

within 3 days.

Release Controls: There is no diking on the pad which was

observed to have cracks.

History of There is no documented evidence of a

Releases: release from this unit.

Conclusions: Soil/Groundwater: The release potential

to soil or groundwater is moderate due to

cracks in the concrete base.

<u>Surface Water:</u> The release potential to

surface water is low to unit design.

Air: The release potential to air is moderate due to the volatile nature of

<u>Subsurface</u> <u>Gas:</u> The potential for the generation of subsurface gas is moderate.

SWMU #22 Vitamin E Satellite Waste Storage Pad, Area #68 (photograph #28)

Unit Description: In area #68, the product from area #69 is

extracted, distilled and crystallized to make liquid and solid vitamin E. Light solvents are used in the process. The drummed waste is stored on a 10 foot by 10

foot area of a concrete pad.

Age of Unit: The unit has been used since 1982.

Date of Closure: The unit is active with no anticipated

date of closure.

Wastes Managed: Wastes generated at area #69 are a mixture

of vitamin E with acetone and hexane, diatomaceous earth, and filters. The drummed waste is transferred to the large hazardous waste pad (SWMU #13) within 48

hours.

Release Controls: The concrete pad is not diked.

History of There is no documented evidence of a

Releases: release from this unit.

Conclusions: Soil/Groundwater: The release potential

to soil or groundwater is low due to unit

design.

<u>Surface Water:</u> The release potential to surface water is low due to unit design.

<u>Air:</u> The release potential to air is moderate due to the volatile nature of

acetone.

<u>Subsurface</u> <u>Gas:</u> The potential for the generation of subsurface gas is low.

SWMU #23 Spent Palladium Storage Pads, Areas #70 and #76 (photograph #29 & #30)

Unit Description:

At area #76, dimer amines are produced from fatty acids, dimer nitrile, and ammonia. Also, surfactants are produced from amines, acrylate and an alkali. A palladium catalyst is used to speed the hydrogenation process which generates a spent palladium waste. The waste is stored on the concrete foundation of the old deriphat building at area #70 until it is shipped off-site. The spent palladium catalyst is staged on the concrete next to the south side of the building at area #76, prior to transfer over to area #70.

Age of Unit:

The waste has been generated since about the beginning of operations in 1948. The deriphat building was torn down in 1981 after which, the foundation was used to store the drummed waste.

Date of Closure:

The unit is active with no anticipated

date of closure.

Wastes Managed:

The spent palladium catalyst goes to a reclamation plant, PGP, Inc. on the east

coast.

Release Controls:

Neither the concrete foundation nor the concrete area on the south side of

building #76 are diked.

History of

There is no documented evidence of a

Releases: release from this unit.

Conclusions:

<u>Soil/Groundwater:</u> The release potential to soil or groundwater is high due to unit design.

<u>Surface Water:</u> The release potential to surface water is high due to unit design.

<u>Air:</u> The release potential to air is low due to the non-volatile nature of the catalyst waste.

<u>Subsurface</u> <u>Gas:</u> The potential for the generation of subsurface gas is low.

SWMU #24 Facility Storm Drainage System (photograph #2, #7 & #32 - #34)

Unit Description: The facility drainage system consists of

two ditches that join to form a series of 3 small overflow ponds. The last pond enters a large storm water lake that is used for the facility's fire protection. What appears to be waste oils, can be observed on the sides of the rock lined

drainage system

Age of Unit: The unit has been used since 1947.

Date of Closure: The unit is active with no anticipated

date of closure.

Wastes Managed: The waste appears to be that of which is

generated from the vitamin E process.

Release Controls: The ponds are unlined.

History of There is no documented evidence of a

Releases: release from this unit.

Conclusions: Soil/Groundwater: The release potential

to soil or groundwater is high due to unit

design.

<u>Surface Water:</u> The release potential to surface water is high due to unit design.

<u>Air:</u> The release potential to air is moderate due to the volatile nature of some of the solvents used at the facility.

<u>Subsurface</u> <u>Gas:</u> The potential for the generation of subsurface gas is moderate.

Unit Description: A refuse compactor and dumpster is used to

rid the facility of trash. The unit is located south of the primary clarifier

(SWMU #8).

Age of Unit: The dumpster was in use beginning in the

early 1970's.

Date of Closure: The unit is active with no anticipated

date of closure.

Wastes Managed: The waste consists of all the facilities

trash. KID picks up the dumpster weekly.

Release Controls: There is no secondary containment.

History of There is no documented evidence of a

Releases: release from this unit.

Conclusions: Soil/Groundwater: The release potential

to soil or groundwater is low due to unit

design and waste composition.

Surface Water: The release potential to

surface water is low due to unit design.

Air: The release potential to air is

low due to waste composition.

<u>Subsurface</u> <u>Gas:</u> The potential for the generation of subsurface gas is low.

Unit Description: The 1963 aerial photograph shows an

approximately 1.5 acre lagoon next to a 3.25 acre landfill on the west end of the facility. The landfill is were lagoon #3

was built.

Age of Unit: unknown

Date of Closure: Use of the area may have been discontinued

after 1972 when the first wastewater

pretreatment plant was built.

Wastes Managed: unknown

Release Controls: There was no secondary containment.

History of There is no documented evidence of a

Releases: release from this unit.

Conclusions: <u>Soil/Groundwater:</u> The release potential

to soil or groundwater was high due to

unit design.

<u>Surface Water:</u> The release potential to surface water was high due to lanfill

runoff and lagoon overflow.

Air: The release potential to air may

have been high due if volatile wastes were

disposed.

<u>Subsurface Gas:</u> The potential for the generation of subsurface gas was moderate.

Compliance History

The facility has had only a few past violations (not posting danger signs, exceeding 500 drummed waste limit). Violations were corrected.

<u>Visual Site Inspection</u>

At 10:23 pm on June 12, 1990, a visual site inspection was conducted by Tim Murphy and Gred Dunn of IEPA. The facility was represented by Greg Rister, Manager of Safty and Regulatory Affairs since 1982. The weather conditions were sunny and pleasant, with a temperature of 85 degrees Fahrenheit.

After introductions, Mr. Rister answered a few questions concerning the history of the facility and informed us of the facility's SWMU's. The group of us then left the offices and proceeded with a golf cart tour of the facility. Most of the active SWMU's were observed and photographed. No obvious contamination was noticed as much of the facility was covered either with concrete, ashphalt or gravel. The inspection ended at 12:35.

Because some of the photographs did not turn out and additional SWMU's were identified, a return visit was conducted on January 18, 1991 beginning at 10:30.

During the return visit, the IEPA team of Tim Murphy, Ron Harmon and Clarance Smith discussed the issues pertaining to the RCRA Part B permit application with Mr. Rister. After the meeting, the group made a quick visit of each SWMU not previously photographed. The weather was cold, damp and windy. The Visual Site Inspection ended at 12:45 pm.

Site Releases/Sampling

Soil sampling has never been conducted at the facility, however due to the evidence of spills, the greatest potential for soil and groundwater contamination exists with SWMU's #1, #3, #5, and #26.

Groundwater Targets

In 1982, Dames and Moore conducted a hydrogeologic study and installed seven monitoring wells. Boring logs indicate materials near the ground surface as fill (silty clay with some coarse gravel, sand and slag) followed by silty clay to a depth of 15-20 feet, which in turn, followed by fractured Silurian Dolomite (aquifer). The hydraulic gradient was calculated at .0002 with a regional ground water flow direction of north-northeast.

As noted in the SWMU identification section (SWMU's #1-11) of this report, the students t-test yielded no significance on indicator parameters from the monitor wells.

Located within a quarter mile of the facility boundary are five private supply wells serving about 14 people (based on the 1990 Census Data of 2.78 persons per household). The wells are open to the shallow Silurian dolomite. A house count of a four mile facility radius estimates that 4873 people draw water from the aquifer.

A boring log generated by the Illinois Department of Transportation (IDOT) describes the geology 3/4 of a mile southeast of the facility as follows:

Depth (feet)	<u>Geologic Material</u>	
0-2	Clay Loam	
3-6	Sandy Loam	
6-11	Silty Clay Loam	
11-17	Dense Gray Linestone	

End Of Boring

Surface Water Targets

The general topography of the area is relatively flat and some of the facility runoff is intercepted and flows into the pretreatment plant. An intermediate flowing ditch runs north alongside the storm water retention pond. After about 5200 feet, the ditch drains into Gar Creek Ditch. The Creek flows east about a mile to the Kankakee River, where at just 2 tenths of a mile downstream is the intake for Consumers Illinois Water Company which supplies Kankakee, Bradley, Bourbonnais and several outlying areas with water. The population served is approximately 55,000 people

Flood Insurance Maps indicate that the site is not located in a 500-year flood boundary.

Air Targets

Actual air releases have not been documented at the site although numerous complaints have been logged. The nearest resident is 2 tenths of a mile from the production area and a day care nursery is a quarter mile away. Within one mile of the site, there is a population of approximately 141 people.

<u>Direct Contact</u>

Facility access is restricted by a chain link fence surrounding the entire production area. Security guards are posted at the entrances to the facility.

Conclusions and Recommendations

Due to limited receptors, the facility does not score high enough to continue in the CERCLA process, however, a RCRA Facility Investigation (RFI) and/or conditions of the Part B Permit should address sampling of the potentially contaminated SWMU's.

The following table lists the facility SWMU's and a summary of suggested further actions for each.

w	
Ň	
. •	

Unit No.		Dates of Operation	Suggested Further Action	Evidence of Release
1-11	Wastewater Pretreatment Plant Areas #64 & #98	1972-present 3 lagoons not used after new system was built in 1986	Sample monitor wells for Appendix I pollutants (35 IAC Sec. 724) Sample soils in lagoon areas for TCLP Install secondary containment for the waste oil storage tank	No
12	Boiler House, Area #60	1976-1986	No further action	No
13	Container Hazardous Waste Storage Area	1982-present	No further action	No
14	Waste Oil Tank Farm Area #11	1947-present	Sample soils for ICLP Install secondary containment	Stained gravel
15	Lab Satellite Waste Pad Area #3	approx. 1980- present	Install secondary containment	No
16	Versacure Satellite Waste Pad and Bag House Area #51	1982-present	Sample nearby soils for TCLP Install secondary containment	spills
17	Polymer Plant Bulk Waste Storage Area #19	1959-present	No further action	No
18	Hazardous Waste Storage T ank Area #69	approx. 1975- present	No further action	No
19	Waste Tar Tank Area #69	1983-present	Install secondary containment	No
20	Bulk Waste Storage Area #26	1976-present	Install secondary containment Store excess waste on pad	Waste on ground
21	Acrylics Satellite Waste Pad Area #71	early 1970's-present	Fix concrete cracks, install secondary containment, sample soils for TCLP	concrete cracks
22	Vit E Satellite Waste Pad Area #68	1982-present	Install secondary containment	No
23	Spent Palladium Pads Areas #70 & #76	1981-present	Install secondary containment Sample soils for TCLP	No
24	Storm Drainage System	1947-present	Sample water and sediment for TCLP	Staining
25	Refuse Compactor and Dumpster	1970's-present	No further action	No
26	Olc Landfill/Lagoon Area West Side of Facility	арргох. 194 7 - 1972	Sample monitor wells as in SWMU's #1-#11 Sample soils in the area to sufficient depth for TCLP	old air photo

DATE: 6-12-90
TIME: 12:03 pm
PHOTOGRAPH TAKEN BY:
Tim Murphy
PHOTO NUMBER: 35
LOCATION: Henkel Corp.
So. Kensington Rd.,
Kankahee, IL
COMMENTS: PICTURE TAKEN TOWARD
the North-Northeast of
the trash compactor
and trash bin (Swmu
#75)



DATE: 1-18-91

TIME: 11.50 AM

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 36

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the South of a 100' x

200' fenced area

described as a drum

Storage area in the

RCRA Part A.



DATE: 6-12-90
TIME: 12:10 pm
PHOTOGRAPH TAKEN BY:
Tim Murphy
PHOTO NUMBER: 33
LOCATION: Henkel Corp.
So. Kensington Rd.,
Kankakee, IL
COMMENTS: PICTURE TAKEN TOWARD
the east of the Storm
water pond series (SWMU

#24)



DATE: 6-12-90

TIME: 12-10 pm

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 34

LOCATION: Henkel Corp.

So. Kensington Rd.

Kanka Kee, IL

COMMENTS: PICTURE TAKEN TOWARD

the Southwest of the

Storm water pend series

(Swmu # 24). Note: oily

S.des of gravel bank.





DATE: 1-18-91

TIME: 11-52 AM

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 32

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the north wear the

New primary clarifier (SWMU
#7) of the Storm water

drainage ditch (SWMU#24)



The Westernmost Secondary clarifier is ahead of the ditch (Swmu #11).

DATE: 6-12-90
TIME: 11:39 pm
PHOTOGRAPH TAKEN BY:
Tim Murphy
PHOTO NUMBER: 29

So. Kensington Rd.,

Kankahee, IL

COMMENTS: PICTURE TAKEN TOWARD

the South of area # 70
deriphat foundation,

used to Store Spent
paladium (SWMU # 23).



DATE: 1-18-91

TIME: 11: 42 Am

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 30

LOCATION: Henkel Corp.

So. Kensington Rd.,

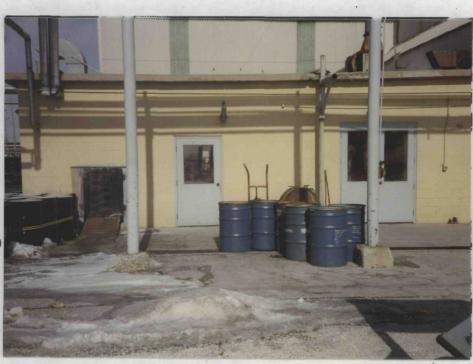
Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the North of the area # 76,

used to Store Spent

paladium (SWMU # Z3)



DATE: 1-18-91		
TIME: 12: 10 pm		
PHOTOGRAPH TAKEN BY:		
Tim Murphy		
PHOTO NUMBER: 27		
LOCATION: Henkel Corp.		
So. Kensington Rd.,		
Kankakee, IL		
COMMENTS: PICTURE TAKEN TOWARD		
the North of the bulk		
Waste Storage at area #26		
(6.41mg 1 # 70)		



DATE: 1-18-91

TIME: 12:20pm

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 28

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the North of the vitamin E

Satellite waste storage

pad at area #68 (Swmu.



DATE: 6-12-90

TIME: 11:43 AM

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 25

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

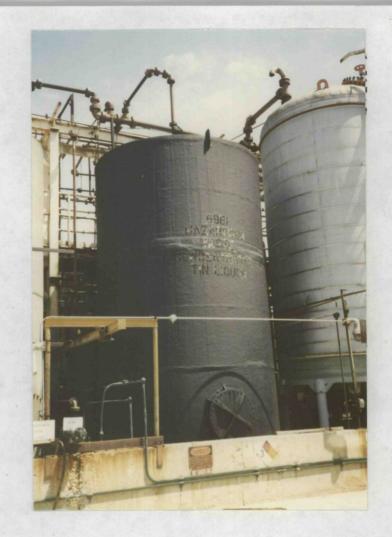
COMMENTS: PICTURE TAKEN TOWARD

the North east of the

hazardous waste, 8000

gallun Storage tank at

area # 69 (SWMU # 18)



DATE: 5-12-90

TIME: 11 49 AM

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 26

LOCATION: Henkel Corp.

So. Kensington Rd.

Kanka Kee, IL

COMMENTS: PICTURE TAKEN TOWARD

The east-scutheast of

the waste tank for holding

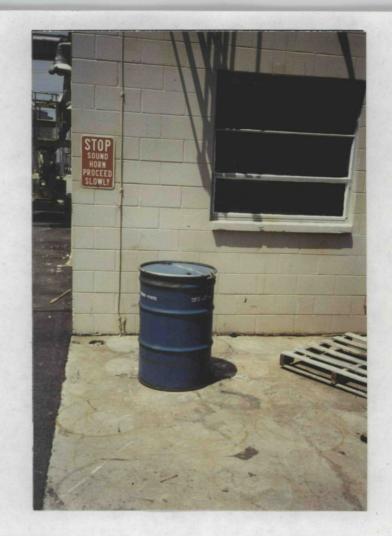
Neutralized tin liquor

tar (SWMU#19) at area

#69



DATE: 6-12-90
TIME: 11:49 Am
PHOTOGRAPH TAKEN BY:
Tim Murphy
PHOTO NUMBER: 23
LOCATION: Henkel Corp.
So. Kensington Rd.,
Kankakee, IL
COMMENTS: PICTURE TAKEN TOWARD
the west of the acylics
satellite storage pad
at area #71 (SWMU#21).



DATE: 1-18-91

TIME: 12 25 pm

PHOTOGRAPH TAKEN BY:

T.M Murphy

PHOTO NUMBER: 24

LOCATION: Henkel Corp.

Sc. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the North of area #19's

Polymer plant where

filtered special waste

(benton, te) is Stored in



≈ 20 cu yd. boxes (SWMU#17)

DATE: 6-12-90

TIME: 11:37 AM

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 21

LOCATION: Henkel Corp.

So. Kensington Rd.,

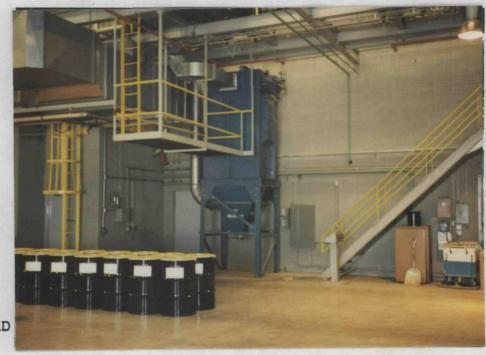
Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the South-Southeast of

the baghouse at area

#51 (SWMU#16).



DATE: 5-12-90

TIME: 12:13 pm

PHOTOGRAPH TAKEN BY:

Tim Murphy
PHOTO NUMBER: 22

LOCATION: Henkel Corp.

So. Kensington Rd.

Kanka Kee, IL

COMMENTS: PICTURE TAKEN TOWARD

the North? of the dust

Collection System at

area # 19 (SWMU#17)



DATE: 6-12-90
TIME: 12:20 pm
PHOTOGRAPH TAKEN BY:
Tim Murphy
PHOTO NUMBER: 19
LOCATION: Henkel Corp.
So. Kensing ton Rd.,
Kanka Kee, IL
COMMENTS: PICTURE TAKEN TOWARD
the North-Northeast of
the laboratory satellite
Storage pad at area#3 (SWMU #15)
(SWMU #15)



DATE: 1-18-91

TIME: 11:45 AM

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 20

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

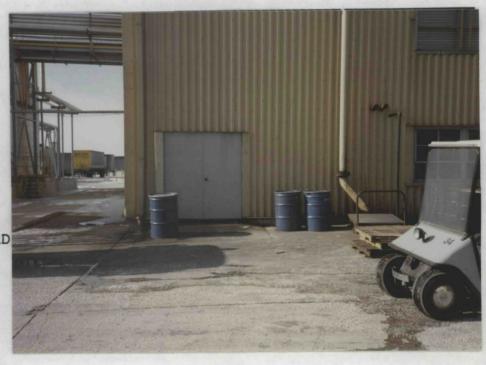
COMMENTS: PICTURE TAKEN TOWARD

the West of the

Versacure satellite

Storage pad (SWMU#16)

at area #51. Note: Spillage
by doors.



DATE: 6-12-90
TIME: 12:15 pm
PHOTOGRAPH TAKEN BY:
Tim Murphy
PHOTO NUMBER: 17
LOCATION: Henkel Corp.
So. Kensing ton Rd.,
Kankakee, IL
COMMENTS: PICTURE TAKEN TOWARD
the southeast of one
of the larger tanks (B-4)
that had held waste
oil in area # 11 (SWMU#14)



DATE: 1-18-91

TIME: 12:15 pm

PHOTOGRAPH TAKEN BY:

Tim Murphy
PHOTO NUMBER: 18

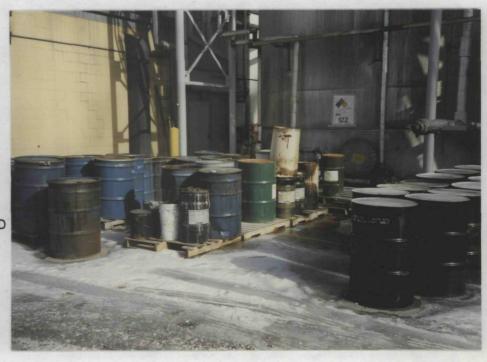
LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the North east of waste
oil tank bottoms, drummed
at area #11 (SWMU #14),



DATE: 6-12-90		
TIME: 11:29 Am		
PHOTOGRAPH TAKEN BY:		
Tim Murphy		
PHOTO NUMBER: 15		
LOCATION: Henkel Corp.		
So. Kensing ton Rd.,		
Kanka Kee, IL		
COMMENTS: PICTURE TAKEN TOWARD		
the south of cone		
bottom tank Z-3 in		
area # 11 (SWMU#14) used		



DATE: 1-18-91

TIME: 12:12 pm

PHOTOGRAPH TAKEN BY:

Tim Murphy
PHOTO NUMBER: 16

to store waste oil.

LOCATION: Henkel Corp.
So. Kensington Rd.,

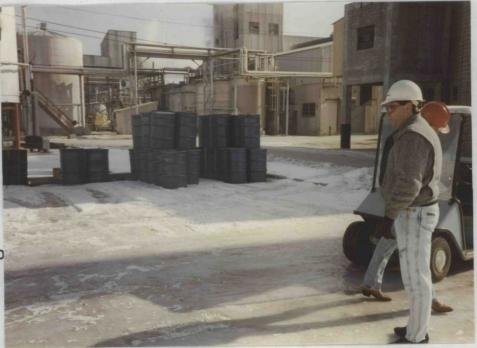
Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the east-Northeast of drummed waste oil at area #11 (SWMU #14)



DATE: [-18-9]		
TIME: 11:55 Am		
PHOTOGRAPH TAKEN BY:		
Tim Murphy		
PHOTO NUMBER: 13		
LOCATION: Henkel Corp.		
So. Kensington Rd.,		
Kankakee, IL		
COMMENTS: PICTURE TAKEN TOWARD		
the east-southeast of		
the hazardous waste		
container storage pad		
(SWMU #13)		



DATE: 1-18-91

TIME: 11:55 AM

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 14

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

The North of the

hazardous waste storage

pad collection Sump

(SWMU # 13)



DATE: 6-12-90		
TIME: 11:58 Am		
PHOTOGRAPH TAKEN BY:		
Tim Murphy		
PHOTO NUMBER: 11		
LOCATION: Henkel Corp.		
So. Kensing ton Rd.,		
Kanka Kee, IL		
COMMENTS: PICTURE TAKEN TOWARD		
the Southeast of one of		
the bilers used to burn		
special wester oil, (SWMU		
#12)		



DATE: 1-18-91

TIME: 11:55 pm

PHOTOGRAPH TAKEN BY:

Tim Murphy
PHOTO NUMBER: 12

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the North-Northeast of
the hazardous waste

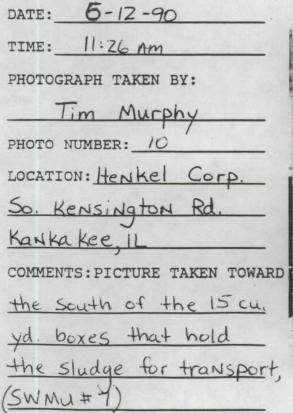
Cantainer storage pad

(SWMU #13).



DATE: 6-12-90
TIME: 11:25 Am
PHOTOGRAPH TAKEN BY:
Tim Murphy
PHOTO NUMBER: 9
LOCATION: Henkel Corp.
So. Kensington Rd.,
Kankakee, IL
COMMENTS: PICTURE TAKEN TOWARD
the southwest of the
filter press (SWMU#7)
IN area #64, across from
which are the two 15,000
galloni pits (SWMU #1).







DATE: [-18-91
TIME: 12:05 pm
PHOTOGRAPH TAKEN BY:
Tim Murphy
PHOTO NUMBER: 7
LOCATION: Henkel Corp.
So. Kensington Rd.,
Kankakee, IL
COMMENTS: PICTURE TAKEN TOWARD
the south-southwest over-
looking the westernmost
airation basin (SWMU#9)
and the drainage ditch ponds (SWMU#24), with
Now used for old equiper
DATE: 1-18-91
TIME: 12:05 pm
PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 8

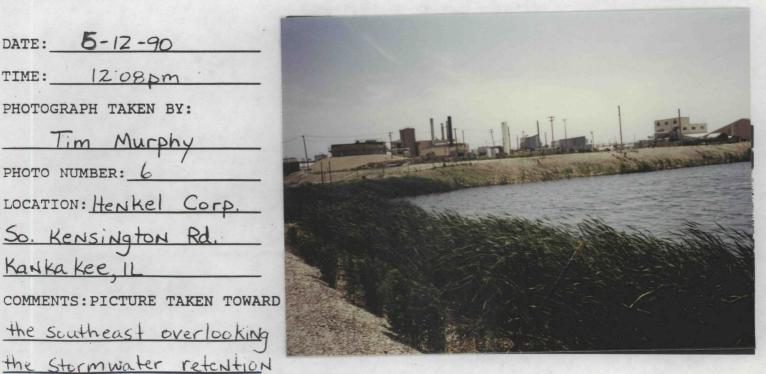


a good look at the filled-in lagoon #3 ment storage.

LOCATION: Henkel Corp. So. Kensington Rd., Kankakee, IL COMMENTS: PICTURE TAKEN TOWARD the east-southeast overlooking the eastern most airation basin (SWMU#10) with a glimps of the top of the eastern most, 55' diameter secondary clarifier (SWMU#6). DATE: 5-12-90 TIME: 12:09 DM PHOTOGRAPH TAKEN BY: Tim Murphy PHOTO NUMBER: 5 LOCATION: Henkel Corp. So. Kensington Rd., Kankakee IL COMMENTS: PICTURE TAKEN TOWARD the southeast of lagoon #3 area after filling, (SWMU #5).



DATE: 5-12-90 TIME: 12'080m PHOTOGRAPH TAKEN BY: Tim Murphy PHOTO NUMBER: 6 LOCATION: Henkel Corp. So. Kensington Rd. Kanka Kee IL COMMENTS: PICTURE TAKEN TOWARD the southeast overlooking



pond, with lagoon #3 (SWMU #5) and the New primary clarifier (SWMU#8) / old lagoon #1 (SWMU#3) in View.

DATE: 1-18-91

TIME: 12:05 pm

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 3

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the Southeast overlooking

the easternmost airation

basin (SWMU #10) with the



two 15,000 gallon primary (SWMU# 1)
treatment pits located in the building with the Z brown garage
doors (area # 64). Steam inside this building fogged the camera lens.

DATE: 1-18-91

TIME: 11 55 Am

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 4

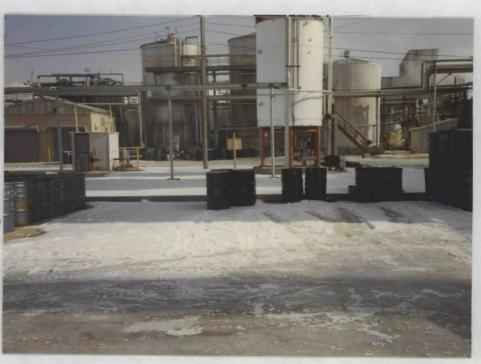
LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the east overlooking the hazardous waste storage pad (SWMU#13), with the white cone bottom tank



(64 Z-1 - 8,500 gallon) designated as SWMU#Z

DATE: 1-18-91

TIME: 11:50 AM

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 1

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

COMMENTS: PICTURE TAKEN TOWARD

the Northwest of the New

Primary clarifier (SWMU#8)

built on top of lagcon #1

(SWMU#3)



DATE: 1-18-91

TIME: 12:05 Am

PHOTOGRAPH TAKEN BY:

Tim Murphy

PHOTO NUMBER: 2

LOCATION: Henkel Corp.

So. Kensington Rd.,

Kankakee, IL

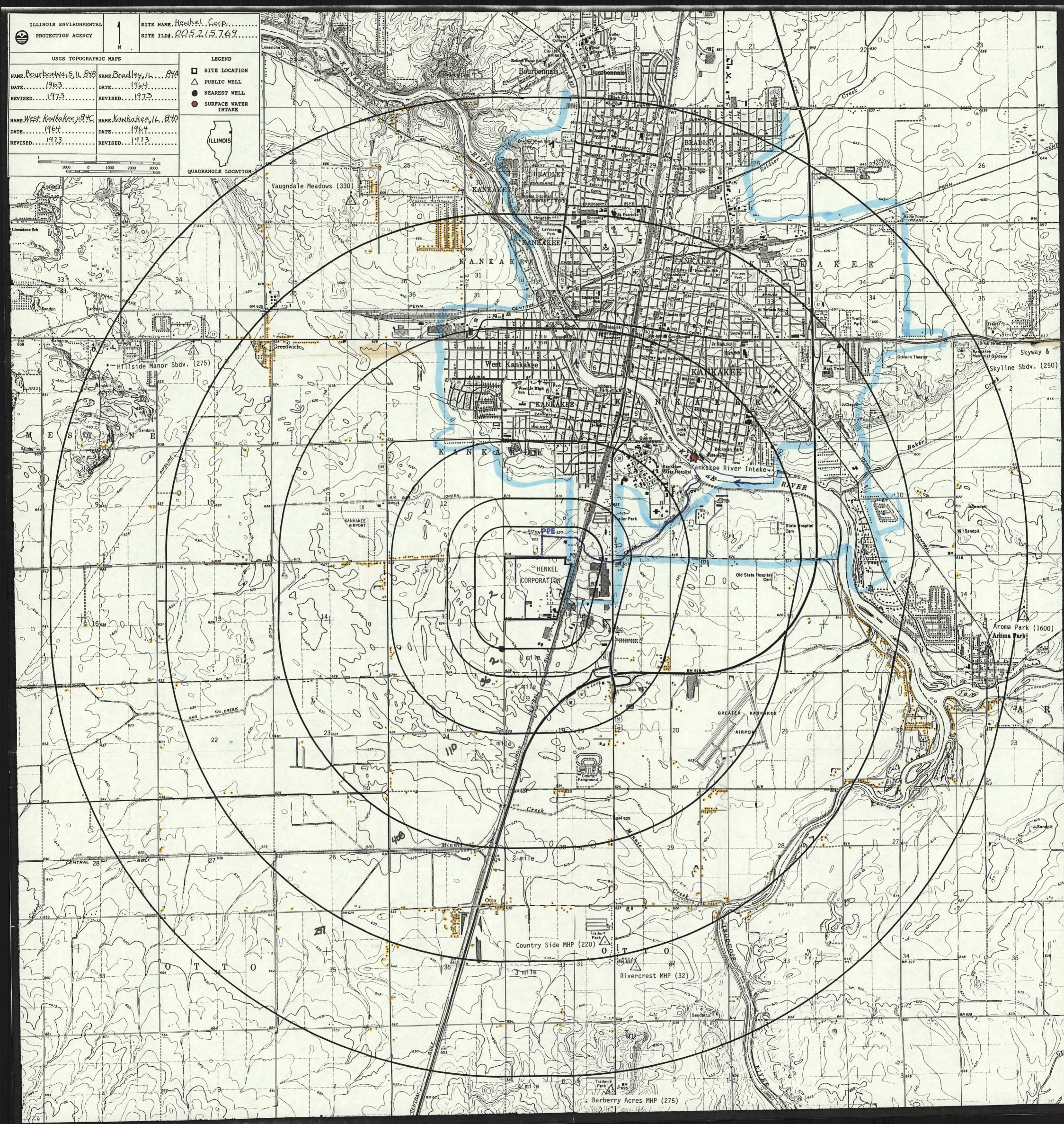
COMMENTS: PICTURE TAKEN TOWARD

the South overlooking the

drainage ditch ponds (SWMU # 24)

with the primary clarifier (SWMU#8) built on top of lagoon #1 (SWMU#3). The eastern portion of filled-in lagoon #3 (SWMU#5) is seen with old equipement on top -.





2	FPA
7/	L! /~\

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

	IFICATION
DI STATE	02 SITE NUMBER
1170	02 SITE NUMBER OC521576°

PART	1 - SITE INFORMATIO	ON AND A	SSESSMEN	7	OC5215769
II. SITE NAME AND LOCATION					
O1 SITE NAME (Legal, common, or descriptive same of after	1			ECIFIC LOCATION IDENTIFIER	
Henkel Corporation				on Rd. Po	
03 CITY			P COOE OS		07COUNTY OB CONG COOR ORST
Kannakee				ankakee	191 15
DO COORDINATES LATITUDE	NGITUDE V	Jest t	iankake	e, il,	9116
09 COCADMATES LATITUDE LO UST :	57 57.0 1	74100	2 - WE	752.5/15	240
from IS7 South of Kunkakee,				•	
to 5 Kensington Rd. go left-	روم علمين المحالين الم	0 1	المسلمان وا	in a	30 11.11 10054
to 3 Kensington Ra. 30 1711	SOUTH TO THE	second	entien	دو	
III. RESPONSIBLE PARTIES					
01 OWNER (* mount	03	STREET (Sue	tool making, makin		
Henkel Corporation	į	4620	W. 7	7 th St.	
OS CITY	04	STATE 05 Z	P CODE	OR TELEPHONE NUMBER	T
Minneapolis	1			16121830-7831	
07 OPERATOR (If brown and different from aumor)	l`	STREET (nine)	
	-				
O9 CITY	10	STATE 11 Z	P CODE	12 TELEPHONE NUMBER	1
				()	
13 TYPE OF DWNERSHIP (Check one)				<u> </u>	
IN A. RCRA 3001 DATE RECEIVED: 11 18 80 MONTH DAY YEAR IV. CHARACTERIZATION OF POTENTIAL HAZARD		WASTE SIT	EICERCLA 103 W	DATE RECEIVED: HONTH	DAY YEAR I'C NUNE
	LEPA B. EPA C	ONTRACTO	R EC.	STATE D. OTHER	CONTRACTOR
WYES DATE C3 1/8 189 CI A	E, LOCAL HEALTH OFFICIA	M. D.F.	OTHER:	(Specify)	
	(TRACTOR NAME(S):				
02 SITE STATUS (Creat ener	03 YEARS OF OPERATE		Peggan	+	
BLA. ACTIVE G.B. INACTIVE G.C. UNKNOWN		948	Present ENDING VE	T UNKNOW	N .
04 DESCRIPTION OF BUBBTANCES POSSIBLY PRESENT, KNOW	W. OR ALLEGED				
F-listed, U-list	ted and D-115+	ed was	الولج		
1,35 , 31			•		
Of DEPONISTION OF DOTELLIES TARRETT TO PARTIE	OOD BOOKH ATTOM				
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AN	(env, runment)	مناهاده	. \		
Civasaaree		r 100	· ,		
	et landsond man	t. 0.00.	ation		
	et (environmen	t, popu	ation)		
Surface Wat	er (environmen	t, popu	ation)		
Surface wat V. PRIORITY ASSESSMENT			·		
Surface Wat	e, complete Plan 2 - Weste falorman	on and Part 3 - O	D. NONE	hus Conditions and Incidents)	and the same of th
V. PRIORITY ASSESSMENT OI PRIORITY FOR INSPECTION (Choca and, if map or modules of chocase) OI A. HIGH O B. MEDIUM	e, complete Plan 2 - Weste falorman	on and Part 3 - O	D. NONE	,	aglion forms
V. PRIORITY ASSESSMENT 01 PRIORITY FOR INSPECTION (Chock and. of high or measure of chocked CT A. HIGH Interpolation required premarity) 1 B. MEDRUM (Interpolation required premarity)	e, complete Plan 2 - Weste falorman	on and Part 3 - Or	D. NONE	,	03 TELEPHONE NUMBER
V. PRIORITY ASSESSMENT O1 PRIORITY FOR INSPECTION (Check and if high or medical of checks CI A. HIGH Integration required primiting) VI. INFORMATION AVAILABLE FROM O1 CONTACT	a, consider Par 2 - Weste (viormalin G C, LOW (Inspect on items avail	er and Port 3 - Or fable bases	D. NONE	,	
V. PRIORITY ASSESSMENT O1 PRIORITY FOR INSPECTION (Chock and. of high or immediate of chockas C1 A. HIGH Interpolation required primitify) VI. INFORMATION AVAILABLE FROM	OZ OF (Agency Organization Henkel Cor	en and Port 3 - 0. Robin Bases; V	D. NONE (No further	,	03 TELEPHONE NUMBER

\$EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

I. IDENTIFICATION

O1 STATE | 02 SITE NUMBER

IL. D | 0052/5769

YEI	A			ASSESSMENT EINFORMATION		ILD 0052	15769
WASTE ST	ATES, QUANTITIES, A	ND CHARACTER	ISTICS				
PHYSICAL ST (A) SOLID B) POWDER (C) SLUDGE D) OTHER			of weste quantilies in tepengent	03 WASTE CHARACTE (A TOXIC B CORROS C RADIOA(D PERSIST	E) SOLUE SIVE F INFEC CTIVE G FLAMI	BLE I HIGHLY N THOUS J EXPLOS MABLE K REACTI	IVE /E ATIBLE
	(Specify)	NO OF DRUMS		<u> </u>			
WASTE T	YPE		· · · · · · · · · · · · · · · · · · ·	·		· 	
ATEGORY	SUBSTANCE	NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS		
SLU	SLUDGE		NACHANA			· · · · · · · · · · · · · · · · · · ·	
OFM	OILY WASTE		MANGWA			 	
SOL	SOLVENTS		INKNOWN			·	
PSD	PESTICIDES					<u></u>	
occ	OTHER ORGANIC	CHEMICALS					
IOC	INORGANIC CHEM	ICALS	ļ			···	
ACD	ACIOS		 		i •	· · · · · · · · · · · · · · · · · · ·	
BAS	BASES			<u> </u>			
MES	HEAVY METALS		1	<u> </u>	l		
	OUS SUBSTANCES IS					1	T OR MEASURE
CATEGORY	02 SUBSTANCE		03 CAS NUMBER	04 STORAGE DISI		05 CONCENTRATION	06 MEASURE CONCENTRATI
	See PCRA Por	+ A N Du	obcitiva soci	mentation S	COMON	<u> </u>	
		-					i
			†			 	
			 				 -
				 			
				 		ļ <u>.</u>	
			<u> </u>	1			1
				<u> </u>		<u> </u>	
							1
							1
			1	†			1
	 			1		 	
	 		 	+		 	
	 		 	 		 	
	<u> </u>			<u> </u>		<u> </u>	1
. FEEDSTO	OCKS 1500 Appendix for CAS Mu	mbers:					
CATEGORY	O1 FEEDSTO	OCK NAME	02 CAS NUMBER	CATEGORY	O1 FEEDST	OCK NAME	02 CAS NUMB
FOS				FDS			
FDS				FDS			
FDS				FDS			
				FDS			
FDS	i		1				

POTENTIAL HAZARDOUS WASTE SITE **PRELIMINARY ASSESSMENT**

I. IDENTIFICATION OI STATE 02 SITE NUMBER

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS II. HAZARDOUS CONDITIONS AND INCIDENTS

01 A GROUNDWATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED	02 C OBSERVED IDATE	POTENTIAL ALLEGED
Students + 13+ Shavea HJ SIANITI CONT		ing TLX, TOO SH + cond.
nowever wanted laguon recieved wast	evater contemina the wastes !	sted as BCAA warr A
, , , , , , , , , , , , , , , , , , ,	, , , , , ,	
		1
01 # B SURFACE WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED 55 000	02 TOBSERVED (DATE)	POTENTIAL ALLEGED
rear ou with my have received facilities	rungett Containing Wast	NAME FOR KANKEKEE
Gradien, Surphoners is 2.2 miles beyon		
, , , , , , , , , , , , , , , , , , , ,		
01 M C CONTAMINATION OF AIR	02 C OBSERVED (DATE)	POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED.	04 NARRATIVE DESCRIPTION	
improved st eders from prestrator	using them were a hadrow action	F-N-2 ~ 170's
·	,	
01 L D FIRE/EXPLOSIVE CONDITIONS 03 POPULATION POTENTIALLY AFFECTED	02 3 OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	C POTENTIAL C ALLEGED
US POPOLATION POTENTIALLY APPECIED	or the wattre beschie flore	
None obseived	·	
01 @ E. DIRECT CONTACT	02 D OBSERVED (DATE)	POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED.	04 NARRATIVE DESCRIPTION	
, ,		
Mone observed		
<u></u>		
01 B F CONTAMINATION OF SOIL ~ 10	02 D OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	POTENTIAL ALLEGED
(Acres)		
old laguous/Loud fill may have con	771 BUREAU TO 20,1	•
01 M G DRINKING WATER CONTAMINATION	02 L) OBSERVED (DATE)	POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED	04 NARRATIVE DESCRIPTION	
none observed, however there are pri	مال المال	
Mone assertion, numerical there are pri	vare wette in the area of clos	23 - mille J-V of Akwaei
01 13 H WORKER EXPOSURE/INJURY 03 WORKERS POTENTIALLY AFFECTED:	02 (1) OBSERVED (DATE) 04 NARRATIVE DESCRIPTION	L POTENTIAL .! ALLEGED
US WORKERS FOTEN HALLY AFFECTED.	OF INDIANTIAE DESCRIPTION	
floue observed		
01 L. I POPULATION EXPOSURE/INJURY	02 (i OBSERVED (DATE)	[] POTENTIAL ALLEGED
03 POPULATION POTENTIALLY AFFECTED		
Note observed		
Whe onserved		

POTENTIAL HAZARDOUS WASTE SITE

PRELIMINARY ASSESSMENT
TION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION 01 STATE 02 SITE NUMBER ILD 005 Z 15 769

-		<u> </u>	
01 D J. DAMAGE TO FLORA D4 NARRATIVE DESCRIPTION	02 CI OBSERVED (DATE)	☐ POTENTIAL	□ ALLEGED
Nome Locumented or observe	d.		
11 C K. DAMAGE TO FAUNA 14 NARRATIVE DESCRIPTION (SECURE ASSESSE) OF SOCCORD	02 OBSERVED (DATE)	D POTENTIAL	☐ ALLEGED
None observed			
D1 [] L. CONTAMINATION OF FOOD CHAIN 34 NARRATIVE DESCRIPTION	02 OBSERVED (DATE)	O POTENTIAL	ALLEGED
None documental or observed			
D1 II M UNSTABLE CONTARMENT OF WASTES	02 E OBSERVED (DATE. 719/63)	☐ POTENTIAL	□ ALLEGED
Old Land fill / Layorn area wa	04 NARRATIVE DESCRIPTION		
D1 (N DAMAGE TO OFFSITE PROPERTY D4 NARRATIVE DESCRIPTION	02 Li OBSERVED (DATE:)	☐ POTENTIAL	□ ALLEGED
None documented or observ	red		
D1 C O. CONTAMINATION OF SEWERS, STORM DRAINS, W D4 NARRATIVE DESCRIPTION			
	It. N 1972, wastes may have	directly e	whered
1. ft station + WWTP of konkake.	e		
01 () P. ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION	02 COBSERVED (DATE:)	() POTENTIAL	☐ ALLEGED
unknown			
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR	ALLEGED HAZAROS		
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR	ALLEGED HAZAROS		
	ALLEGED HAZAROS		
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR III. TOTAL POPULATION POTENTIALLY AFFECTED: IV. COMMENTS			
MI. TOTAL POPULATION POTENTIALLY AFFECTED: _			
MI. TOTAL POPULATION POTENTIALLY AFFECTED: _			
MI. TOTAL POPULATION POTENTIALLY AFFECTED: _	<u>ξς∞</u>)()		

Supporting Documentation

<u>Document</u> <u>Reference</u>	Number
Henkel Corporation RCRA Part A	1
Henkel Corporation/IEPA Correspondence 07/22/82	2
IEPA/Henkel Corporation Correspondence 11/15/82	3
IEPA Memorandum 05/09/83	4
Henkel Corporation Spill Prevention Control 09/16/83	5
Henkel Corporation/IEPA Correspondence 03/13/84	6
IEPA Inspection Waste Disposition Form 03/18/88	7
IDOT Borings	8
RCRA Part B Permit Application	*

^{*} Available from IEPA and USEPA

NKAKEE

6 K

CC CITY OR TOWN

D-STATE

E. ZIP CODE

60901

VIL SIC CODES (4-digit, in order of priority)				
VIL SIC CODES 14-0/9/L III COLOR		The state of the state	B. SECOND	Salar Sa
7 2 3	erials and Resins	7 2, 8, 3, 3 (speci	Medicinals and Bot	rnicals
C. THIRD	ရေးသည်။ လူလိုင်ရေးများများသည်။ သည်		HEZZ O. FOURTH	
7 2 8 4 3 Surface Activ	_	7 2 8 9 9 (spec	Chemical/Preparati	iens, N.E.C.
VIII. OPERATOR INFORMATION	运出的 加速的			A CONTRACTOR OF THE PARTY OF TH
and the second s	A NAME		n Vangerer in Silver Sage	B. Is the name list:
SHENKEL CORPOR			,	YYES 1
SHERKEL CORTOR		N. TAF maked market for the control		
C. STATUS OF OPERATOR (Enter the	" 			
	than federal or state 1	(specify) Private	8 1 5	9 3 2 6 7 5
ではないはなない。これできて大変ではならいので は、800年 8		東京の発展をおりませる。		Allerere Male
SOUTH KENSINGT				
	TOWN WARE SERVICE TOWN	GSTATE H.		
BKANKAKEE	1	I 1 6 0	9 0 1 ls.the facility.locs	TO NO
16 16 17 17 17 18 18 18 18 18 18 18 18 18 18 18 18 18	<u> </u>	!!	and the second of the second	
X EXISTING ENVIRONMENTAL PERMITS				Carried and the Samuel
A. NPDES (Discharges to Surface Water)	G T I	ions from Proposed Source		
9 N	9 P	<u> </u>		The same of the sa
B_UIC (Underground Injection of Fluids	TO THE STATE OF EAT	HER (specify)	And the second of the second o	No. Series
	0.00		(specify)	
	20 10 10 17 10		See Attac	hment
C. RCRA (Hasardous Wastes)				
9 R	9-2-		(specify)	
	公司		可以为我们的关系的 。	A CONTRACTOR OF THE PARTY OF TH
Attach to this application a topographighte outline of the facility, the location	of each of its existing an	d proposed intake and	discharge structures, each	of its mazardous we
treatment, storage, or disposal facilities water bodies in the map area. See instru	s, and each: well where it. Ictions for precise requirem	injects fluids undergrou	ind include all springs, ri	vers and other sur
XIL NATURE OF BUSINESS (provide a brief				
		a military with the state of th	ورام المراجع والمراجع المراجع	
The Henkel Corporation pla	nt produces speci	alem chamical co	omnounds includin	o dimer acid
polyamide resins, fatty ni	trogen compounts.	Vitamin E. ster	rols and starch b	ased polymer
, polydaled 1001m2, 1000, m	,	, _ , _ ,	*1	i ı
			F	90/5/
-			·	
		• •		
·				
				and the second
XIII. CERTIFICATION (see instructions)				
I certify under penalty of law that I hat attachments and that based on my i	ave personally examined a	nd am familiar with the	information submitted i	n this application a
application, I believe that the informa false information, including the possibi	tion is true; accurate and	complete. [.am aware :	that there are significant	penalties for subm
A NAME & OFFICIAL TITLE (Type or print)	B. SIGI	VATURE		C. DATE SIGNED
L. L. Adler		NOT ZE	41	1/1/17/
V. P Engr. & Mfgr.		/ /		1//////
COMMENTS FOR OFFICIAL USE ONLY	The state of the s	Recording to the second		
C				
EPA Form 3510-1 (6-80) REVERSE				

HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program

I. EPA I.D. NUMBER

		(This informati	on is required under Sec.	tion 3005 of RCRA.)	FIL D00 52 (516)
	AL USE ONLY		A STATE OF THE STA	District Control of the Control of t	The second second second
	I DATE RECEIVED			COMMENTS	
H. FIRST O	R REVISED APPLI	CATION	all all all and	The state of the s	
Place an "X" in	the appropriate box	in A or B below (m.	ark one box only) to ind	licate whether this is the first	application you are submitting for your facility crif this is a revised application, enter your facility
			provide the appropriate		
A11. EX	ISTING FACILITY (S	Complete item beloi	definition of "existing" ; v.)	racinty.	21 2.NEW FACILITY (Complete item below.) FOR NEW FACILITI
8 48	? ? ? ? OPE	RATION BEGAN O the boxes to the left		UCTION COMMENCED	YR. MO. DAY (yr, mo., & day) OPE TION BEGAN OR IS EXPECTED TO SEG
1	· APPLICATION (; CILITY HAS INTER!		and complete Item I abo	ve)	2. FACILITY HAS A PCRA PERMIT
<u> </u>	SES - CODES AN		CITIES		77
A. PROCESS entering co- cescribe the	CODE — Enter the codes. If more lines are process (including it	de from the list of p needed, enter the co s design capacity) in — For each code en	process codes below that ode(s) in the space provided on t	best describes each process to ded. If a process will be used	that is not included in the list of codes below, the
1, AMOU! 2. UNIT 0	IT — Enter the amous F MEASURE — For (nt. each amount entered	in column B(1), enter t	the code from the list of unit	measure codes below that describes the unit of
measure	used. Only the units	of measure that are	tisted below should be t	used.	
			RIATE UNITS OF E FOR PROCESS		PRO- APPROPRIATE UNITS OF CESS MEASURE FOR PROCESS
p;	ROCESS	CODE DESIG	N CAPACITY	PROCESS	CODE DESIGN CAPACITY
Storage:	R (barrel, drum, etc.)	SOI GALLONS	OR LITERS	Trestment:	TO1 GALLONS PER DAY OR
TANK WASTE PILI		SOZ GALLONS SOZ CUBIC YA	OR LITERS RDS OR	SURFACE IMPOUNDMEN	LITERS PER DAY
Ī	APOUNDMENT	SO4 GALLONS	TERS OR LITERS	INCINERATOR"	LITERS PER DAY TOS TONS PER HOUR OR
Disposal:				•	METRIC TONS PER HOUR: GALLONS PER HOUR OR
'HJECTION ANDFILL LAND APPL OCEAN DIS	- ICATION	D80 ACRE-FEE would cove depth of on HECTARE D81 ACRESOR D82 GALLONS	METÉR HECTARES PÉR DAY OR	OTHER (Use for physical, thermal or biological treatr processes not occurring in surface impoundments or a core. Describe the process the space provided; Item I	ment LITERS PER DAY tanks, naturer- ses in
SURFACE	MPOUNDMENT	DSS GALLONS	OR LITERS		
UNIT OF M	EASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS.			LITERS PER DAY		ACRE-FEET
CUBIC YAR		Y	TONS PER HOUR	HOUR W	HECTARE-METER
GALLONS	R COMPLETING IT	U			HECTARES
GALLONS P EXAMPLE FO other can hold	R COMPLETING IT	EM III (shown in lin ility also has an inci		below): A facility has two s	torage tanks, one tank can hold 200 gallons and the
GALLONS P	R COMPLETING IT	U EM III (shown in lin	e numbers X-1 and X-2	below): A facility has two s	•
GALLONS F EXAMPLE FO other can hold	R COMPLETING ITI 400 gallons. The fac DUP	EM III (shown in lin lility also has an inci	e numbers X-1 and X-2 nerator that can burn up	belowl: A facility has two so to 20 gallons per hour.	torage tanks, one tank can hold 200 gallons and the
GALLONS PEXAMPLE FO	R COMPLETING ITI 400 gallons. The fac DUP	EM III (shown in lin iiity also has an inci	enumbers X-1 and X-2 nerator that can burn up OF MEA SURE (enter code)	Delow): A facility has two so to 20 gallons per hour. A. PRO- B. PRO- CESS CODE XD (from list above)	ROCESS DESIGN CAPACITY 1. AMOUNT 2. UNIT OF MEASURE (enter code)
EXAMPLE FOOTHER CAN HOLD CLESS (CODE (From list above)	PR COMPLETING ITI 400 gallons. The fac DUP B. PROCESS	EM III (shown in lin iiity also has an inci	e numbers X-1 and X-2 nerator that can burn up 2. UNIT OF MEA SURE (enter code) 2. UNIT OF MEA SURE (enter code)	Delow): A facility has two so to 20 gallons per hour. A. PROCESS CODE CODE (from list above)	ROCESS DESIGN CAPACITY 1. AMOUNT 2. UNIT OF MEASUSE (enter ONL)
GALLONS FEXAMPLE FOOther can hold	PR COMPLETING ITI 400 gallons. The fac DUP B. PROCESS	EM III (shown in lin iiity also has an inci	enumbers X-1 and X-2 nerator that can burn up OF MEA SURE (enter code)	Delow): A facility has two so to 20 gallons per hour. A. PRO- B. PRO- CESS CODE XD (from list above)	ROCESS DESIGN CAPACITY 1. AMOUNT 2. UNIT OF MEASURE (enter code)
EXAMPLE FOOTher can hold Contact A. PROCESS EXAMPLE FOOTHER CODE (From lest above)	PR COMPLETING ITI 400 gallons. The fac DUP B. PROCESS	EM III (shown in lin iiity also has an inci	e numbers X-1 and X-2 nerator that can burn up ITY 2. UNIT OF MEA SURE (enter code) G G G G G G G G G G G G G	Delowi: A facility has two so to 20 gallons per hour. A. PROCESS CODE NOTIFICATION (Informatical above)	ROCESS DESIGN CAPACITY 1. AMOUNT 2. UNIT OF MEASURE (enter code)
EXAMPLE FOOTHER CAN HOLD CERS WHAT CERS CERS CERS (from list above) X-1 S A 2 X-2 T 0 3	DUP B. PROCESS 1. AM (spec	EM III (shown in lin iiity also has an inci	e numbers X-1 and X-2 nerator that can burn up CITY 2. UNIT OFFICIAL SURE (enter code) G G E CONLY	A. PROCESS CODE NOTICE (from list above)	ROCESS DESIGN CAPACITY 1. AMOUNT 2. UNIT OF MEASURE (enter code)
A. PROCESS UN (from law above) 1 S (A 2 1 S (A 2	DUP B. PROCESS 1. AM (spec) 335,175 698,300 1,500,000	EM III (shown in lin ility also has an inci	e numbers X-1 and X-2 nerator that can burn up 2. UNIT OF MEAS (USE (enter code) G G G G	A. PROCESS CODE (from list above)	ROCESS DESIGN CAPACITY 1. AMOUNT 2. UNIT OF MEASURE (enter code)
A. PROCESS (From list above) 1 S A 2 1 S A 2 1 S A 2 1 S A 2	DUP B. PROCESS 1. AM (spec) 335,175 698,300 1,500,000 1,500,000	EM III (shown in lin ility also has an inci	e numbers X-1 and X-2 nerator that can burn up ITY 2. UNIT OF MEA SURE (enter code) G G G G	A. PROCESS CODE (From list above)	ROCESS DESIGN CAPACITY 1. AMOUNT 2. UNIT OF MEASURE (enter code)

PROCESSES (continued) ACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "TO4"). FOR EACH PROCESS ENTERED HERE CLUDE DESIGN CAPACITY.

TO4 - Pretreatment Facility

This plant has a pretreatment waste treatment facility which removes 88% to 96% of the BOD, solids, fats, oils and greases from the plant waste water before discharging into the Kankakee municipal sewer system. This pretreatment facility is operated to maintain a waste effluent into the municipal sewers with loadings below 400 MG/L of BOD's, 450 MG/ of suspended solids and 50 MG/L of FOG. This facility consists of primary treatment, secondary treatment (two aerated lagoons), clarification and sludge dewatering using a belt filter press. The system effluent is pumped to the Kankakee sewer system through a lift station. The capacity of this system is 1,500,000 gal./day.

TO4 - Thermal Process

Waste oil is burned in two process/heating steam boilers as a fuel. Total capacity of waste oil is 5400 gallons per hour. This is burned simultaneously with natural gas.

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Support D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristies and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that weste that will be handled on an annual casis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed wastels) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	CODE
POUNDSP	KILOGRAMS	
TONS	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant. Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the

extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

DITE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by are than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns 8.C. and D by estimating the total annua quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

AMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pound r year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two waste e corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimate 30 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

		A.	. F	ΞP	۾ ,		T	<u>.</u>		UN														D. PROCESSES
	W		ST	ΓE	N	40	οį		S	UR ente	E				1. 1	PRC	CE (e)		s co	DE	.5	;	٠,	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
(-1	K	[0	5	;]	4	1	900		P		T	0	3	D	8	0	,	1	1		ī	ī	era mili
[-2	D	1/6	2	()	2	!	400		P		T	0	3	D	8	0		١	1	1	i	1	
<u>3</u>	D	C	7	0	,	\overline{I}	T	100		P		T	0	3	D	8	0	7	1	7	T	1	1	
	D	10	0	6)	2	1						ī	1		I	1	T		1	1		т -	included with above

.

9 EPA Form 3510-3 (6-80) 30

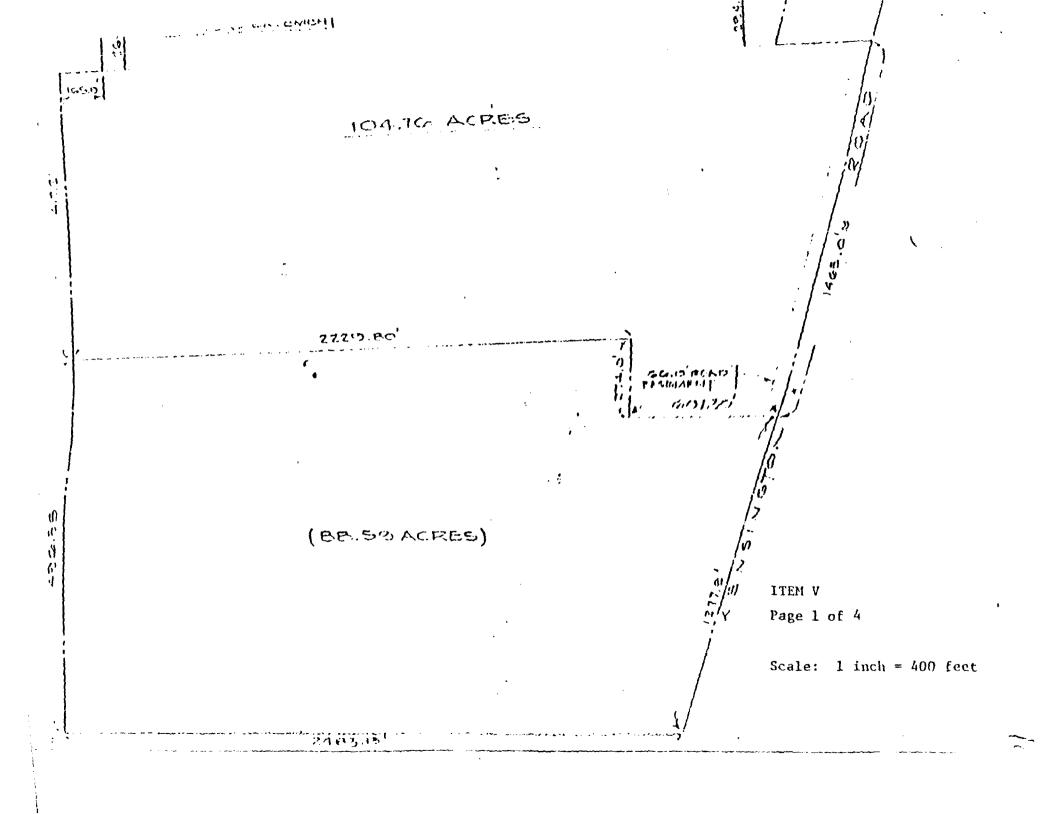
490

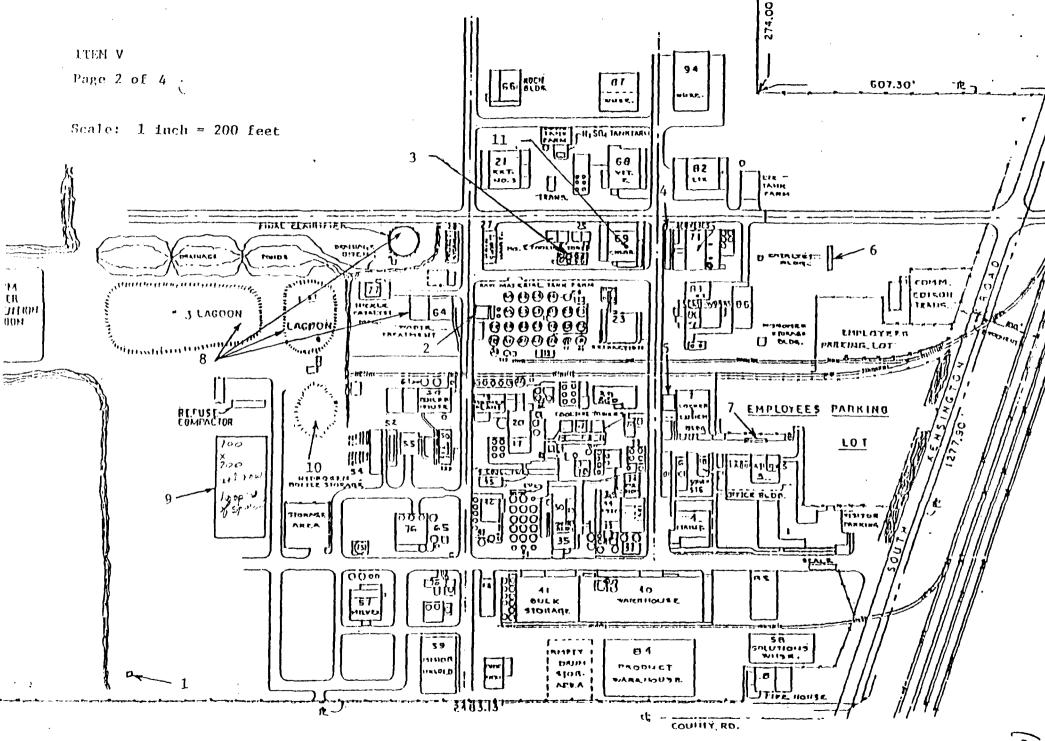
11 6

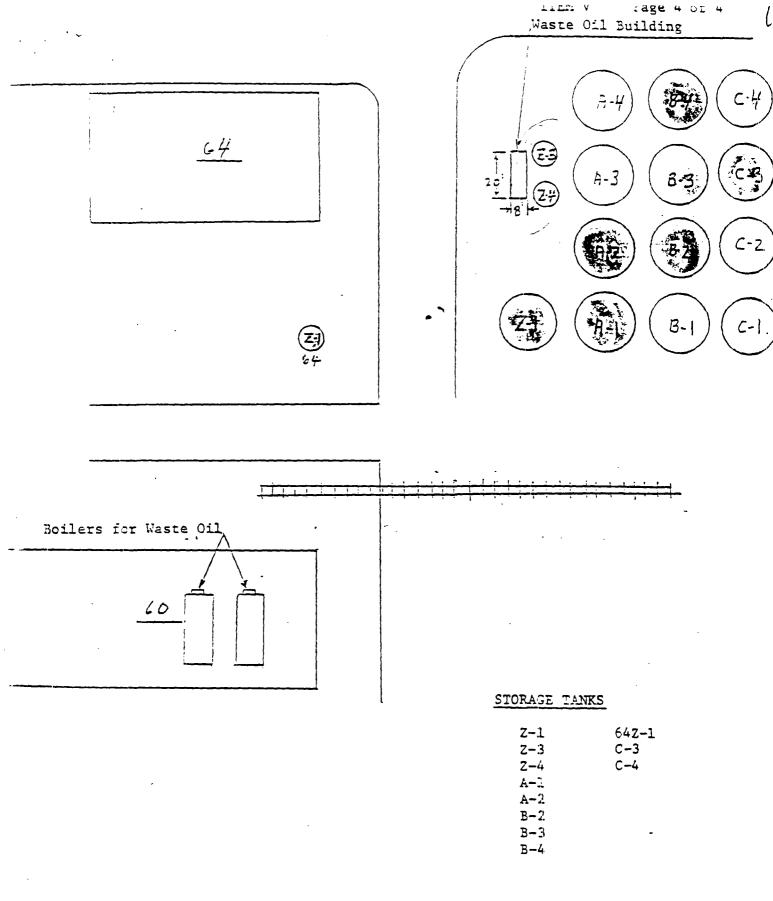
26 ly

	•	
		•
EPA I.D. NO. (enter from page 1)		
ILD005615767 6		<u>-</u>
FACILITY DRAWING	AND THE RESIDENCE OF THE PARTY	
existing facilities must include in the space provided on	page 5 a scale drawing of the facility (see instructions for	more detail). L Le HISS
I. PHOTOGRAPHS		
all existing facilities must include photographs (aeri		
reatment and disposal areas; and sites of future stor	rage, treatment or disposal areas (see instructions for	or more detail).
II. FACILITY GEOGRAPHIC LOCATION		
LATITUDE (degrees, minutes, & seconds	, LONGITUDE (at	egrees, minutes, & seconds)
41 05 /18	8 7	5 2 5 2
III. FACILITY OWNER		74 73 74 77 79
X A. If the facility owner is also the facility operator as i	listed in Section VIII on Form 1, "General Information".	place an "X" in the box to the left and
A. If the facility owner is also the facility operator as I skip to Section IX below.	listed in Section VIII on Form 1, "General Information",	place an "X" in the box to the left and
skip to Section IX below.		
skip to Section IX below. B. If the facility owner is not the facility operator as I	isted in Section VIII on Form 1, complete the following	items:
skip to Section IX below. B. If the facility owner is not the facility operator as I		
skip to Section IX below. B. If the facility owner is not the facility operator as I	isted in Section VIII on Form 1, complete the following	items:
Skip to Section IX below. B. If the facility owner is not the facility operator as I 1. NAME OF FACIL	isted in Section VIII on Form 1, complete the following	2. PHONE NO. (area code & no.
skip to Section IX below. B. If the facility owner is not the facility operator as I	isted in Section VIII on Form 1, complete the following LITY'S LEGAL OWNER 4. CITY OR TOWN	2. PHONE NO. (area code & no.
Skip to Section IX below. B. If the facility owner is not the facility operator as I 1. NAME OF FACIL	isted in Section VIII on Form 1, complete the following LITY'S LEGAL OWNER 4. CITY OR TOWN	2. PHONE NO. (area code & no.
Skip to Section IX below. B. If the facility owner is not the facility operator as I 1. NAME OF FACIL	isted in Section VIII on Form 1, complete the following LITY'S LEGAL OWNER 4. CITY OR TOWN	2. PHONE NO. (area code & no.
skip to Section IX below. B. If the facility owner is not the facility operator as I 1. NAME OF FACIL 3. STREET OR P.O. BOX Y. OWNER CERTIFICATION	isted in Section VIII on Form 1, complete the following	2. PHONE NO. (area code & no.
3. STREET OR P.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in	isted in Section VIII on Form 1, complete the following LITY'S LEGAL OWNER 4. CITY OR TOWN C G examined and am familiar with the information sundividuals immediately responsible for obtaining to	2. PHONE NO. (area code & no. state of the no. state of t
3. STREET OR P.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in the personal of the personal ocuments and complex to the personal ocuments.	isted in Section VIII on Form 1, complete the following LITY'S LEGAL OWNER 4. CITY OR TOWN C G examined and am familiar with the information sundividuals immediately responsible for obtaining to	2. PHONE NO. (area code & no. state of the no. state of t
3. STREET OR P.O. BOX 3. STREET OR P.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in obmitted information is true, accurate, and compleaduding the possibility of fine and imprisonment.	examined and am familiar with the information standividuals immediately responsible for obtaining the lam aware that there are significant penalties for the lambda in the	2. PHONE NO. (area code & no. sistems: 2. PHONE NO. (area code & no. sistems: 5. ST. 6. ZIP CODE
3. STREET OR P.O. BOX 3. STREET OR P.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in obmitted information is true, accurate, and completeluding the possibility of fine and imprisonment. NAME (print or type)	ate. I am aware that there are significant penalties following to the standard penalties for a significant penalti	2. PHONE NO. (area code & no. state of the no. state of t
3. STREET OR P.O. BOX 3. STREET OR P.O. BOX Certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in obmitted information is true, accurate, and comple cluding the possibility of fine and imprisonment. NAME (print or type) L. L. Adler	examined and am familiar with the information standividuals immediately responsible for obtaining the lam aware that there are significant penalties for the lambda in the	2. PHONE NO. (area code & no. sistems: 2. PHONE NO. (area code & no. sistems: 5. ST. 6. ZIP CODE
3. STREET OR P.O. BOX 3. STREET OR P.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in abmitted information is true, accurate, and comple cluding the possibility of fine and imprisonment. NAME (print or type) L. L. Adler V. P. Engr. & Mfgr.	ate. I am aware that there are significant penalties following to the standard penalties for a significant penalti	2. PHONE NO. (area code & no. sistems: 2. PHONE NO. (area code & no. sistems: 5. ST. 6. ZIP CODE
3. STREET OR P.O. BOX 3. STREET OR P.O. BOX 3. STREET OR P.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in Jumitted information is true, accurate, and completeluding the possibility of fine and imprisonment. NAME (print or type) L. L. Adler V. P. Engr. & Mfgr. OPERATOR CERTIFICATION	examined and am familiar with the information standividuals immediately responsible for obtaining the. I am aware that there are significant penalties for the standard of the	2. PHONE NO. (area code & no. sistems: 2. PHONE NO. (area code & no. sistems) 5. ST. 6. ZIP CODE submitted in this and all attached the information, I believe that the for submitting false information, C. DATE SIGNED
3. STREET OR P.O. BOX 3. STREET OR P.O. BOX 3. STREET OR P.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in obmitted information is true, accurate, and completeluding the possibility of fine and imprisonment. NAME (print or type) L. L. Adler V. P. Engr. & Mfgr. COPERATOR CERTIFICATION certify under penalty of law that I have personally certify under penalty of law that I have personally	examined and am familiar with the information state. I am aware that there are significant penalties for examined and am familiar with the information state. I am aware that there are significant penalties for examined and am familiar with the information state.	2. PHONE NO. (area code & no. sistems: 2. PHONE NO. (area code & no. sistems) 1.
Skip to Section IX below. B. If the facility owner is not the facility operator as I 1. NAME OF FACIL 1. NAME OF FACIL 2. OWNER CERTIFICATION Certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in Jumitted information is true, accurate, and completeluding the possibility of fine and imprisonment. NAME (print or type) L. L. Adler V. P. Engr. & Mfgr. Certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in Jubmitted information is true, accurate, and complete under the information i	examined and am familiar with the information state. I am aware that there are significant penalties for obtaining the examined and am familiar with the information state. I am aware that there are significant penalties for obtaining the examined and am familiar with the information state.	2. PHONE NO. (area code & no. sistems: 2. PHONE NO. (area code & no. sistems) 5. ST. 6. ZIP CODE ibmitted in this and all attached the information, I believe that the for submitting false information, C. DATE SIGNED ibmitted in this and all attached the information, I believe that the
3. STREET OR P.O. BOX 3. STREET OR P.O. BOX 3. STREET OR P.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in Jumitted information is true, accurate, and completeluding the possibility of fine and imprisonment. NAME (print or type) L. L. Adler V. P. Engr. & Mfgr. Certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in ocuments, and that based on my inquiry of those in ocuments, and that based on my inquiry of those in	examined and am familiar with the information state. I am aware that there are significant penalties for obtaining the examined and am familiar with the information state. I am aware that there are significant penalties for obtaining the examined and am familiar with the information state.	2. PHONE NO. (area code & no. sistems: 2. PHONE NO. (area code & no. sistems) 5. ST. 6. ZIP CODE ibmitted in this and all attached the information, I believe that the for submitting false information, C. DATE SIGNED ibmitted in this and all attached the information, I believe that the
Skip to Section IX below. B. If the facility owner is not the facility operator as I 1. NAME OF FACIL 1. NAME OF FACIL 2. OWNER CERTIFICATION Certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in Jumitted information is true, accurate, and completeluding the possibility of fine and imprisonment. NAME (print or type) L. L. Adler V. P. Engr. & Mfgr. Certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in Jubmitted information is true, accurate, and complete under the information i	examined and am familiar with the information state. I am aware that there are significant penalties for obtaining the examined and am familiar with the information state. I am aware that there are significant penalties for obtaining the examined and am familiar with the information state.	2. PHONE NO. (area code & no. sistems: 2. PHONE NO. (area code & no. sistems) 5. ST. 6. ZIP CODE ibmitted in this and all attached the information, I believe that the for submitting false information, C. DATE SIGNED ibmitted in this and all attached the information, I believe that the
3. STREET OR F.O. BOX 3. STREET OR F.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in obmitted information is true, accurate, and completeluding the possibility of fine and imprisonment. NAME (print or type) L. L. Adler V. P. Engr. & Mfgr. OPERATOR CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in the complete complete information is true, accurate, and complete complete information is true, accurate, and complete coluding the possibility of fine and imprisonment.	examined and am familiar with the information strate. I am aware that there are significant penalties in individuals immediately responsible for obtaining the examined and am familiar with the information strate. I am aware that there are significant penalties in individuals immediately responsible for obtaining the examined and am familiar with the information strate. I am aware that there are significant penalties in ite. I am aware that there are significant penalties in ite. I am aware that there are significant penalties in ite. I am aware that there are significant penalties in ite. I am aware that there are significant penalties in ite. I am aware that there are significant penalties ite.	2. PHONE NO. (area code & no.) 3. St. 11
3. STREET OR F.O. BOX 3. STREET OR F.O. BOX Y. OWNER CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in obmitted information is true, accurate, and completeluding the possibility of fine and imprisonment. NAME (print or type) L. L. Adler V. P. Engr. & Mfgr. OPERATOR CERTIFICATION certify under penalty of law that I have personally ocuments, and that based on my inquiry of those in the complete complete information is true, accurate, and complete complete information is true, accurate, and complete coluding the possibility of fine and imprisonment.	examined and am familiar with the information strate. I am aware that there are significant penalties in individuals immediately responsible for obtaining the examined and am familiar with the information strate. I am aware that there are significant penalties in individuals immediately responsible for obtaining the examined and am familiar with the information strate. I am aware that there are significant penalties in ite. I am aware that there are significant penalties in ite. I am aware that there are significant penalties in ite. I am aware that there are significant penalties in ite. I am aware that there are significant penalties in ite. I am aware that there are significant penalties ite.	2. PHONE NO. (area code & no.) 3. St. 11

DESCRIPTION OF HAZARDOUS WASTES (continued)
USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.







Scale 1 inch = 40 feet

10

LEGEND

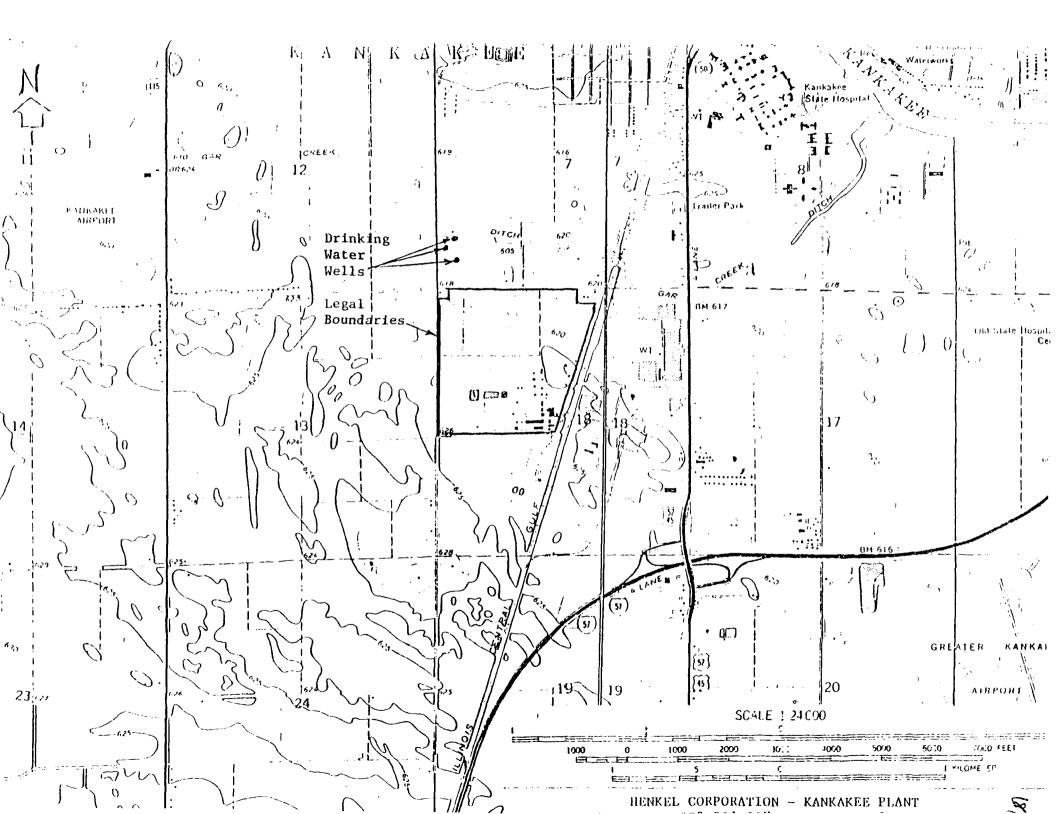
- 1. Drum Storage, 10' x 10' 2/ 57
- 2. Drum Storage, 30' x 30' doon no bornes page in the
- 3. Storage Tank, 10' diameter when have in house, war-
- 4. Drum Storage, 17' x 90' old mil service wast
- 5. Drum Storage, 33' x 35' SSF Lunion Lunion 22 -
- 6. Drum Storage, 10' x 50' ing recordy State to message
- 7. Drum Storage, 8' x 45'
- 8. Pretreatment Facility
 - a. Area 64, Primary Pit and Belt Filter, 50' x 90'
- 300 5. 1st Lagoon, 90' x 120' 50 3 of the
 - c. 3rd Lagoon, 110' x 290'
- d. Final Clarifier, 55' diameter
 - 9. Drum Storage, 100' x 200'
- 10. Past 2nd Lagoon, 85' x 110' (50,000 juic
- 11. Storage Tank, 5' diameter and me = Health of the lygnon

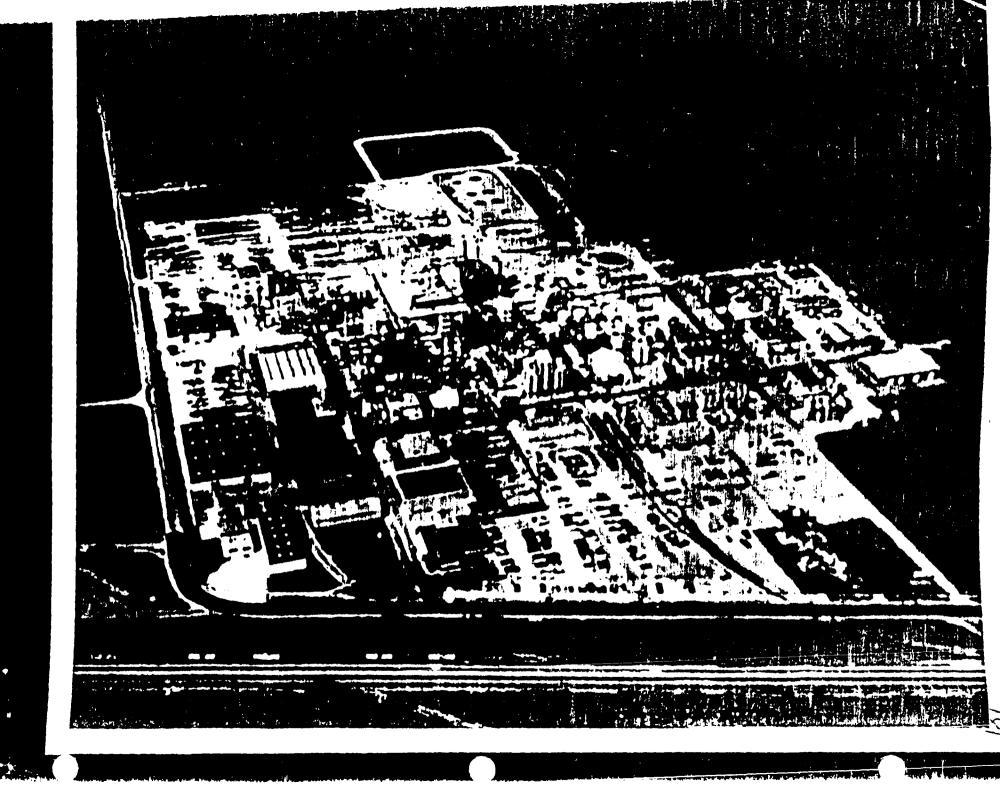
ITEM X

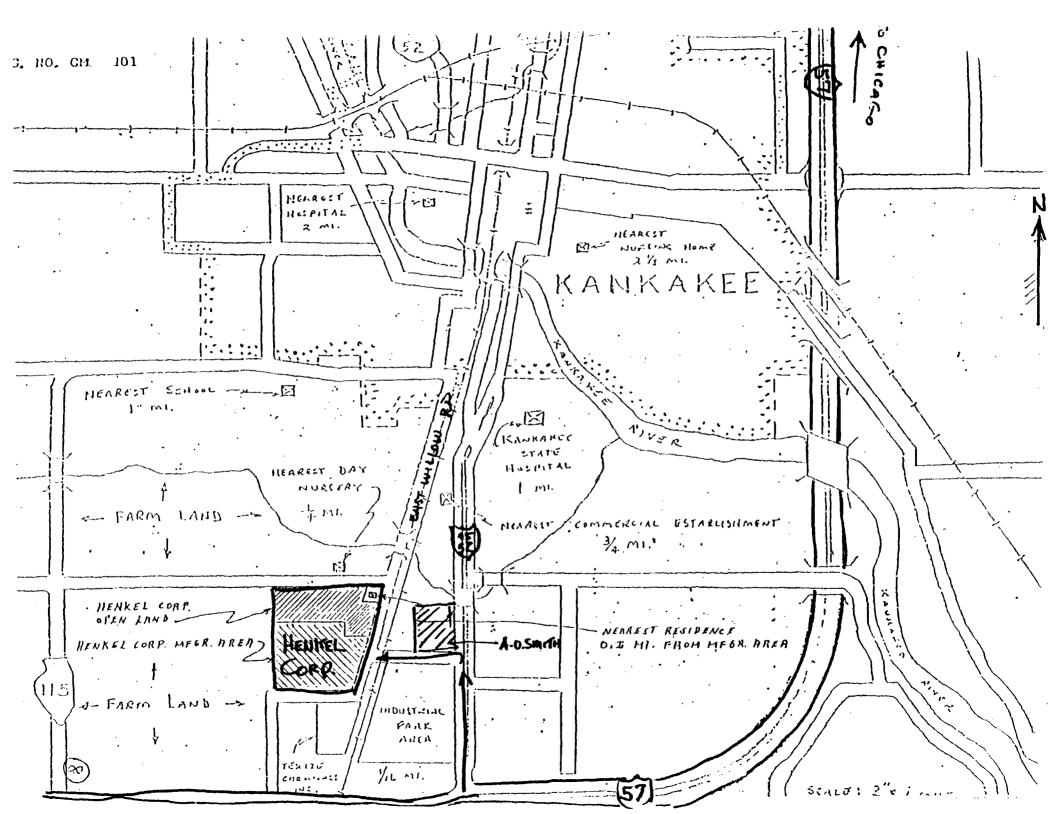
Solid Waste Disposal Permits - Authorization Numbers, Illinois

Operating Permits - Emission Sources, Illinois

72111327	0 30 80073	08050031	03060207	09060037
02111020	72100302	75080041	09060028	09060030
02111073	090 20006	02100303	09060035	09060032
02111326	02090353	09050014	09060027	09060034
73010457	0 20 90385	09050018	02090352	09060031
03010530	7 30 10530	03060208	09060039	09060033
09060036	09060056	09060052	09060055	09060054
09060053	09060066	09060065	09060067	09060064
09060068	09060004	80060044	02090386	02100306
02100218	02100217	02100307	02100308	02100309
02100310	-02111328	B003058		









Couth Kensington Apag Nankakee (L. 50901 515 932-675)

July 22, 1982

REFERENCE NUMBER 2

Mr. Patrick Giordano
Illinois Environmental Protection Agency
Division of Land Pollution Control
Compliance Assurance Section
2200 Churchill Road
Springfield, Illinois 62706

RE: IEPA Site No. 09105507 USEPA No. 1LD005215769

Dear Mr. Giordano:

In accordance with our telephone conversation of this date, I am changing our IEPA site number to that as indicated above. I am also enclosing the information that we have on the monitor well borings. In addition, a copy of the plot plan showing the well locations is also enclosed.

Yours truly,

Frank H. Beberdick

Engineer

Enc:

CC: Mr. James Brossman

Frank H. Believlik

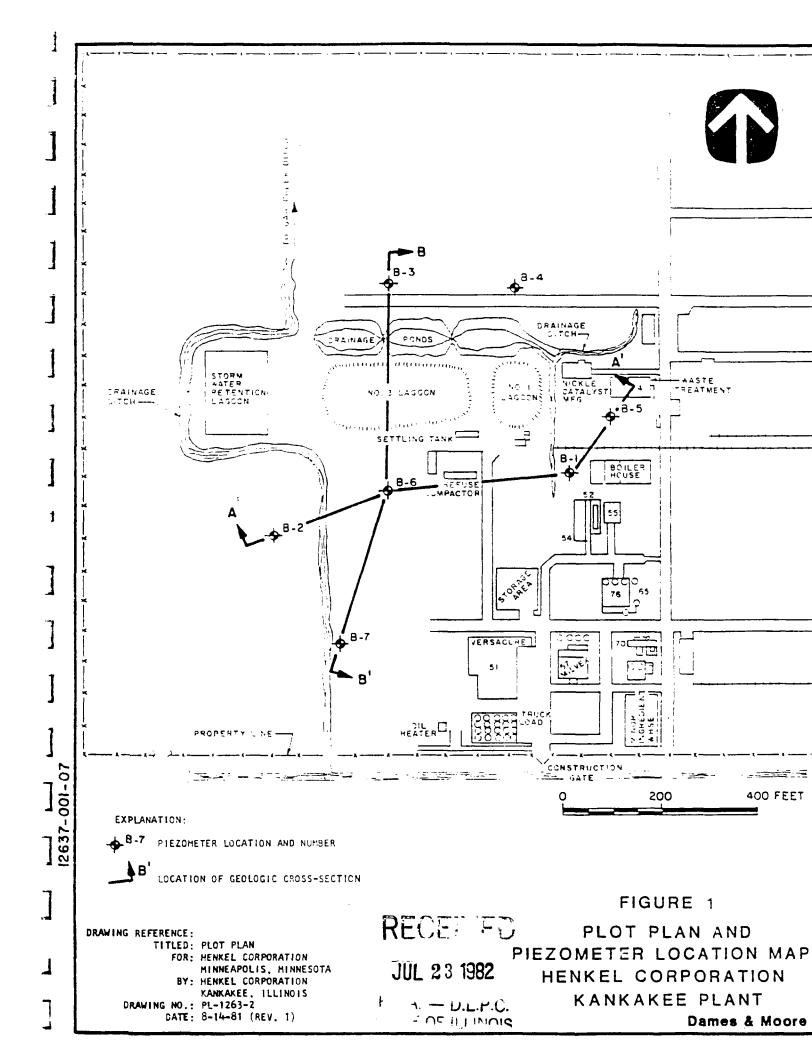
USEPA Region V

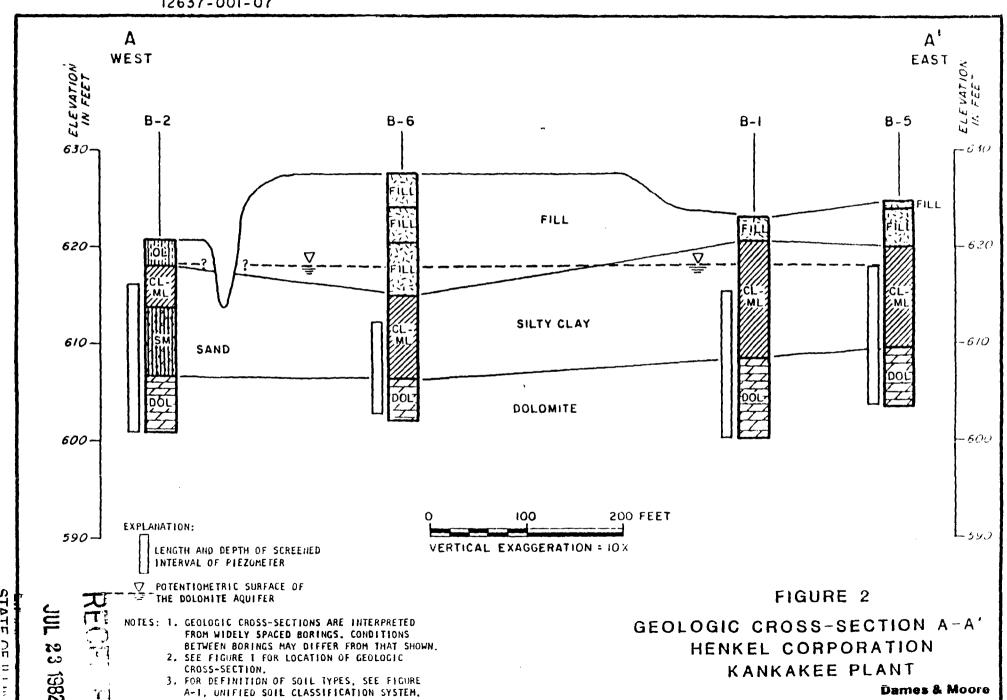
FHB/mf

JUL 2 3 1982

09105507 KANKAKÉE | HENKEL

STATE OF ILLINOIS





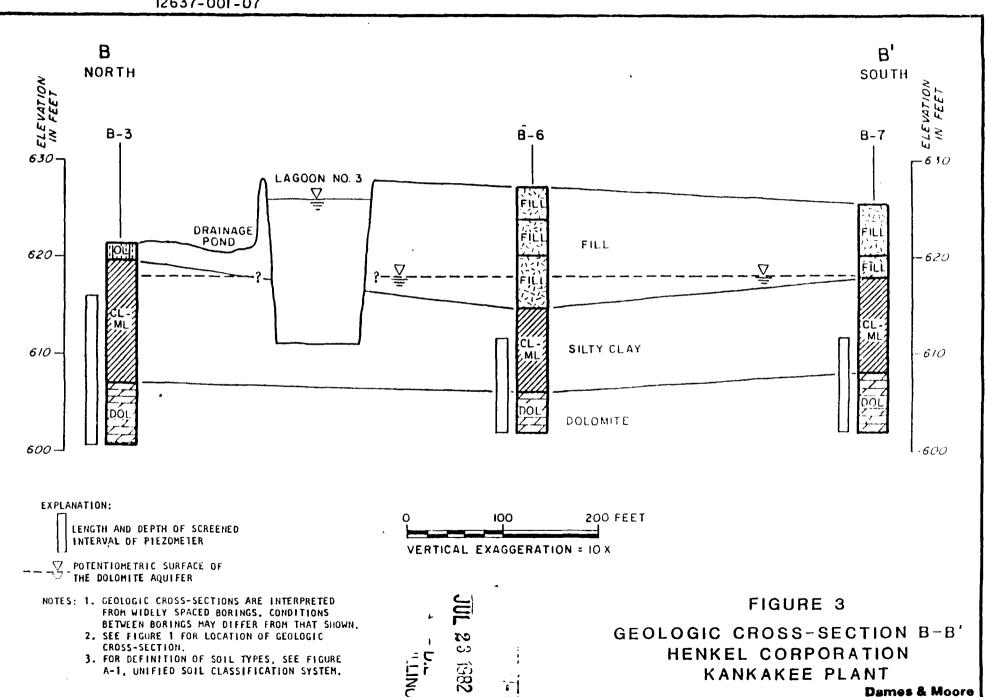


TABLE 1

CONSTRUCTION DETAILS OF INSTALLED PIEZOMETERS

PIEZOMETER	INSTALLATION DATE	SCREENED INTERVAL (ft below land surface)	EFFECTIVE INTERVAL (ft below land surface)	LAND SURFACE ELEVATION (ft above MSL)	ELEVATION - TOP OF PVC PIPE (ft above MSL)	GEOLOGIC MATERIALS
B-1	10/14/81	7.8 - 22.8	5.8 - 22.8	623.3	625.90	Silty clay & dolomite
B-2	10/13/81	4.8 - 19.8	3.8 - 19.8	620.6	622.91	Silty sand & dolomite
B-3	10/13/81	5.3 - 20.3	4.3 - 20.3	621.3	623.79	Silty clay & dolomite
B-4	10/13/81	6.5 - 21.5	5.6 - 21.5	623.2	626.15	Silty clay & dolomite
B-5	11/02/81	6.7 - 21.2	5.5 - 21.5	624.7	626.74	Silty clay & dolomite
B-6	11/03/81	15.5 - 25.0	14.5 - 25.0	627.8	630.32	Silty clay & dolomite
B-7	11/03/81	13.5 - 23.0	10.0 - 23.0	625.5	627.79	Silty clay & dolomite

JUL 23 1982
L.F.A. — U.L., STATE OF ILLINOIS

TABLE 3
SUMMARY OF FIELD PERMEABILITY TESTS

PIEZOMETER	<pre>HYDRAULIC CONDICTIVITY (permeability) (cm/s)</pre>	SCREENED INTERVAL (ft below land surface)	GEOLOGIC MATERIAL
B-1	1.2×10^{-3}	7.8 - 22.8	Silty clay & dolomite
8-2	2.3×10^{-3}	4.8 - 19.8	Silty sand & dolomite
B - 3	2.8 x 10 ⁻³	5.3 - 20.3	Silty clay & dolomite
B-4	2.8×10^{-3}	6.5 - 21.5	Silty clay & dolomite
B-5	4.2×10^{-4}	6.7 - 21.2	Silty clay & dolomite
B-6	1.4×10^{-4}	15.5 - 25.0	Silty clay & dolomite
B-7	2.0×10^{-3}	13.5 - 23.0	Silty clay & dolomite



JUL 23 1382

E A. - U.L.C.
STATE OF ILLINOIS

12637 -001 -07 HENKEL -2

APPENDIX

JUL 23 1982

INVESTIGATIVE METHODOLOGIES

E.r.A. - D.L.P.C. STATE OF ILLINOIS

DRILLING

The subsurface hydrogeologic conditions at the site were investigated by drilling 7 exploratory borings ranging in depth from 19.8 to 25.0 feet. All borings extended at least 4 1/2 feet into the dolomite bedrock. Subsequent to drilling, piezometers were installed in each boring.

The test drilling was performed by D&G Drilling, Inc., of New Lenox, Illinois, during two separate phases. Borings B-1 through B-4 were drilled in Phase I during the period October 12 through October 14, 1981. Borings B-5 through B-7 were installed in Phase II during the period November 11 through November 12, 1981. Drilling was accomplished by utilizing a truck-mounted rig and continuous flight augers, rotary wash, and NX rock coring techniques.

Soil samples were taken at intervals not exceeding 5 feet with the standard split spoon sampler as well as with the Dames & Moore type "U" sampler (Figure A-4). Selected samples were tested at the Dames & Moore soils lab to aid in classification of the soil (see Key to Logs of Borings and Logs of Borings, Figure A-2.1 through Figure A-2.4).

Continuous rock-coring was done at the first 4 borings to provide representative samples of the stratigraphic and physical characteristics of the bedrock underlying the site.

PIEZOMETER INSTALLATION

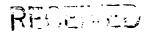
Seven piezometers were installed during the present field operations. Piezometer installations consisted of 2-inch diameter Schedule 80 PVC pipe

with 0.010 slot screen, 10 to 15 feet in length. Screens were placed within the upper bedrock and into the overlying glacial deposits. Sand or gravel was packed around each screen to a level 1 to 5 feet above the screen. A thin, 1-to 3-foot layer of fine sand was placed above the sand or gravel to prevent downward migration of bentonite or grout into the gravel pack. Bentonite pellets were dropped to form a 1- to 2-foot seal to prevent water seepage from overlying strata. The remaining annulus was filled with a cement-bentonite grout to the surface. A 5-foot section of 6 inch protective steel casing was placed over the piezometer for protection. Each piezometer installation is illustrated on the Logs of Borings (Figures A-2.1 through A-2.4).

Piezcmeters were developed by using a surface centrifugal pump and a hand bailer.

FIELD PERMEABILITY TESTS

Rising head field permeability tests were performed in the piezometers installed during the present study. The test procedure consisted of bailing a known quantity of water from the piezometer and monitoring the rate of recovery of the water level. All hydraulic conductivities (permeabilities) were calculated using the analytic method of Hvorslev (1951).



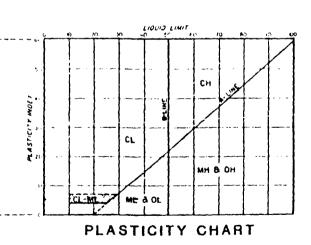
JUL 23 1982

E.P.A. — D.L.P.C. STATE OF ILLINOIS

W	AJOR DIVI	SIONS	GRAPH SYMBOL	LETTER SYMBOL	TYPICAL DESCRIPTIONS
	GRAVEL	CLEAN GRAVELS		GW	ofi, smaped chart, t chart, same distract, cotty t po me h off
COARSE	GRAVELLY SO-IS	f.5(1).		GP	Pignis county county density take mighthib title on an rock
GRAINED SOIL S	ones inco to ". or county inac for phicings on or sive	Di s mega) comment con comment comment comment comment		GM	girt chousig smart; - Sond bir w studies
				GC	CLATER EPANELS SHEET SAME ELAT MITCHES
	\$ 4 N D	CLEAN SAND		sw	will faable lands smartill lands sellet ga ng tings
#0 86 T-64 39 %	SANDY			SP	roomer campes tamps taketer tames, 1.9712 pp up fines
,emfty I-en ne jug 5 f≪ 1 f4	wort from 30%, as count reac from 5538.78 as a 3 2 4	SANCS WITH FINES APPRICAGE AMOUNT OF FREE		SM	s is been been biff minimals
				sc	C. 2187 32093, 8400 C.47 W-FFWES
F·NE GRAINED SOILS		(-00 0 \-007 \615 1=44 10		ML	incapenic Sighy and upder find Sends Book Figure, bight do Crarde find banks on dearge bight with bight peakficity
	SILFS AND CLATS		2 1/4	CL	weather frais or the 14 million Prostfit destart trass tens fram butt trass fam trass
				OL	unionic bills bay companic
midd Than dy l, j. problem we go while <u>Ball</u> yang go chair Ball				MH	rozousij suits mestebus 64 Berometebus frag 8568 64 5-579 Bore#
	SILTS CIGUD C WI AND BERIES THAN BO CLAYS		N. P.	СН	increased dears of mon Penalicals, Pat Georg
				ОН	greens ceans of medium fo men Peoplicify, observe hets
#IGI	V ORGANIC S	OIL \$	150	PΥ	efat, mumus smamm dmics mile mide ddismic (dmilmis

	1	PARTICLE SIZE			
MATERIAL SIZE	10014	COMEN LIMIT		UPPER LIMIT	
	MIL AND TEM	54 16 B126	WILLIAM PERS	516 of 5-26 0	
\$4%.					
Fret	0/4	m200+	0 44	0.420	
ME DOW	247	240 4	120	∌ +0 ∎	
(04#\$E	210		4 74		
EMANEL					
F-101	4.74		191	3/4" *	
COARSE	100	, , ,	76.2	3 •	
COM- ES	76 7	7.	30	-:,	
BOUL OF #5	3744	130:	914 4	16	

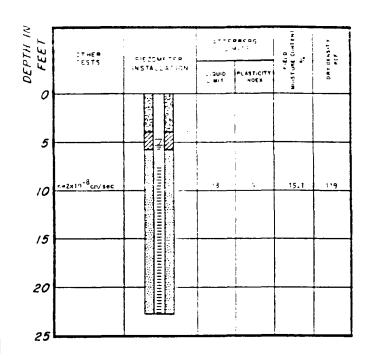
GRADATION CHART



SOIL CLASSIFICATION CHART

FIGURE A-1
UNIFIED SOIL CLASSIFICATION CHART

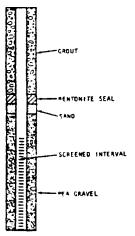
JUL 23 1932 E.F.A. — U.L.I C STATE OF ILLINOI

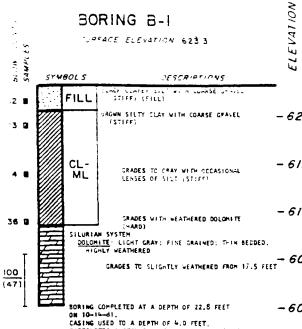


REY TO CAMPLES:
THE NUMBER OF BLOWS REQUIRED TO CRIVE THE 3.25" D.D.
BY 2.42" 1.0. JAMES & MOORE TYPE U SAMPLER 12" OR
LENGTH INDICATED WITH A 310 POUND HAMMER FALLING 30".

- 24 # CEPTH OF RELATIVELY UNDISTURBED SAMPLE OBTAINED WITH THE DAMES & MOORE SAMPLER. B DEPTH OF DISTURBED SAMPLE OBTAINED WITH THE DAMES &
 - $\boldsymbol{\Omega}$ DEPTH OF SAMPLING ATTEMPT WITH NO RECOVERY USING THE DAMES & MODRE SAMPLER.
- THE NUMBER OF BLOWS REQUIRED TO DRIVE THE 2.0" O.D. BY 1.4" I.D. STANDARD SPLIT SPOON SAMPLER 12" OR LENGTH INDICATED WITH A 140 POUND HAMMER FALLING 30".
- 61 @ DEPTH OF DISTURBED SAMPLE OBTAINED WITH THE SPLIT
 - DEPTH OF SAMPLING ATTEMPT WITH NO RECOVERY USING THE SPLIT SPOON SAMPLER

DETAILS TO PIEZOMETER INSTALLATION:





RECOVERY TERMINOLOGY:

PERCENT RECOVERED INDICATES TOTAL AMOUNT OF COME RECOVEMED FOR EACH RUN. EXPMESSED AS A PERCENTAGE OF THE TOTAL LENGTH OF THE CORE RUN. 100 - AOCK QUALITY DESIGNATION IRQD! - A MODIFIED COSE PECOVERY PERCENTAGE IN WHICH ALL PIECES OF SOUND CORE GVER 4 INCUES LONG ARE COUNTED AS RECOVERY. THE MODIFIED SUM OF CORE RECOVERED IS THEN EXPRESSED AS A PERCENTAGE OF THE TOTAL LENGTH OF THE CORE RUM.

OF PERCENT ROD DESCRIPTIVE ROCK QUALITY

O - 25

VERY POOR
25 - 50

POOR
50 - 75

FAIR
75 - 90

COOD (47)

PIEZONETER INSTALLED WITH SCREENED INTERVAL FROM 7.8 TO 22.8 FEET ON 10-14-d1. SROUND WATER LEVEL RECORDED AT A DEPTH OF 5.25 FEET ON 10-14-d1.

LENGTH O 0 - 25 25 - 50 50 - 75 75 - 90 90 - 100

WEATHERING TERMINOLOGY:

THE ROCK SHOWS NO DISCOLORATION, LOSS OF STRENGTH, CR ANY OTHER EFFECT OF WEATHERING.

SLIGHTLY THE ROCK IS SLIGHTLY DISCOLORED, BUT NOT NOTICEABLY WEATHERED: LOWER IN STRENGTH THAN THE FRESH ROCK.

MODERATELY THE ROCK IS DISCOLORED AND NOTICEABLY WE-FEMED 5.2" WEATHERED: 2-INCH DIAMETER, DRILL CORES CANNOT USUALLY BE BROKEN BY HAND ACROSS THE ROCK FABRIC.

HIGHLY THE ROCK IS USUALLY DISCOLORED AND MEARENED TO SUCH AN MEATHERED: EXTERT THAT 2-INCH DIAMETER CORES CAN BE BROKEN UP BY HAND ACROSS THE ROCK FABRIC, WET STRENGTH USUALLY MUCH LOWER THAN DRY STRENGTH.

EXTREMELY THE ROCK IS DISCOLORED AND IS ENTIFIELY CHANGED TO A SCIL, WEATHERED: BUT THE DRIGINAL FABRIC OF THE ROCK IS MUSTLY FRESEAVED. THE PROPERTIES OF THE SOIL DEPEND UPON THE COMPOSITION AND STRUCTURE OF THE PARENT ROCK.

BEDDING TERMINOLOGY

AVERA	JŁ 1		ICKNESS	TERM
		0.001	FOOT	CHINLY LAMINATED
0.001	TO	0.01	FOOT	LAMINATED
0.01	TO	0.1	FOOT	THIN BECDED
0.1	TO	1.0	FOOT	MEDIUM BEODED
		1.0	FOOT	THICK SECRED

OTHER TESTS:

K - PERMEABILITY IN CTV sec

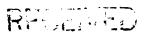
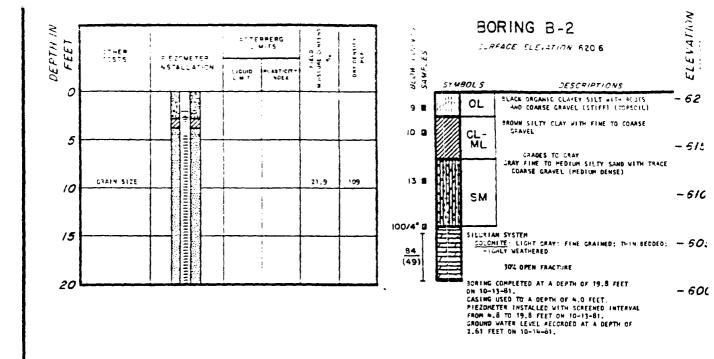


FIGURE A-2.1 LOG OF BORINGS

JUL 23 1982

E. - - 1). L. M.C. STAKE OF ILLINOIS



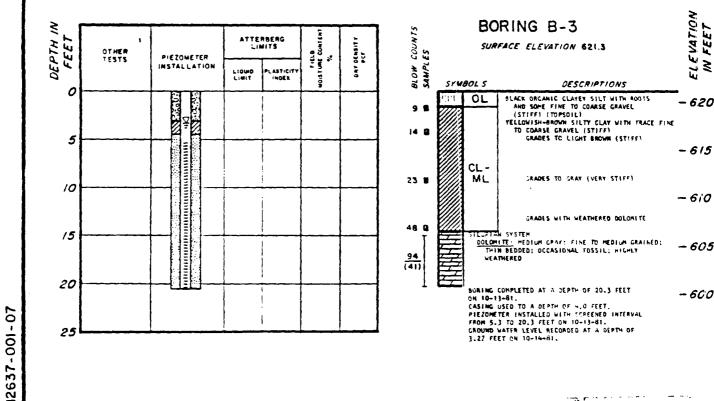


FIGURE A-2.2 LOG OF BORINGS REUE IL

JUL 23 1982

E.P.A. — U.L. STATE OF ILLINOIS

Dames & Moore

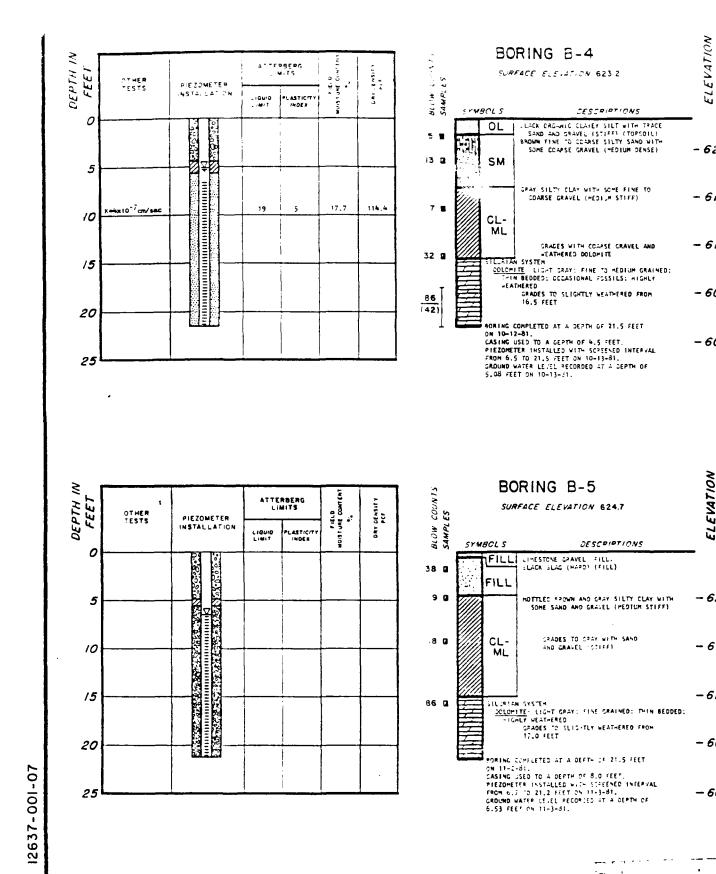
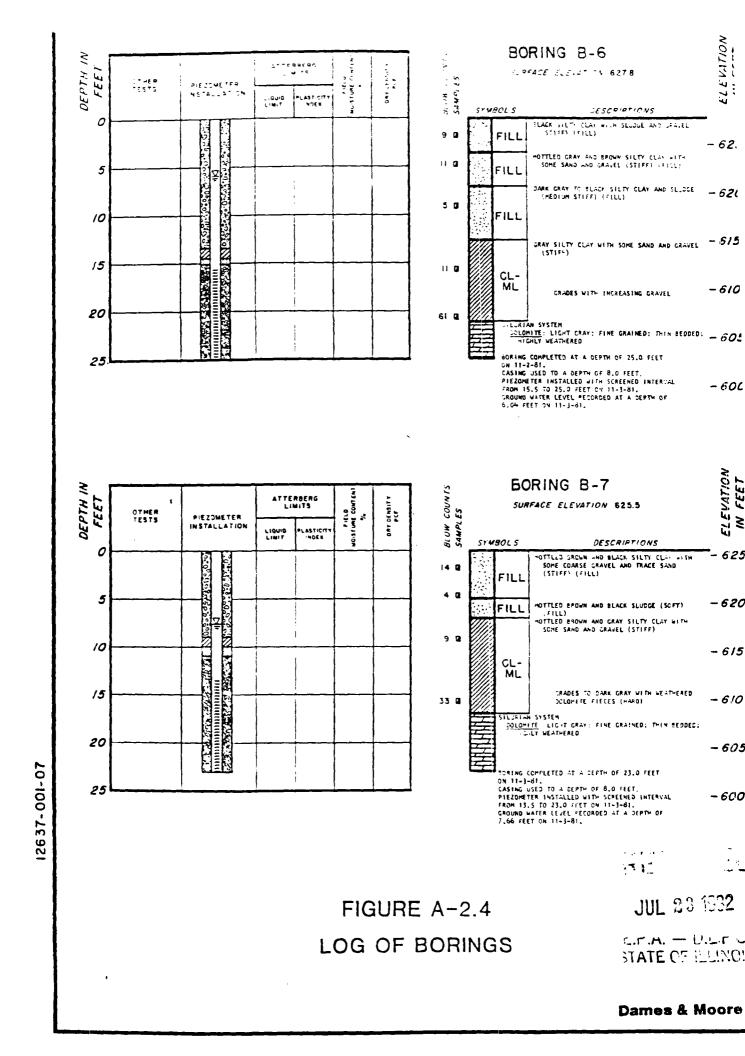
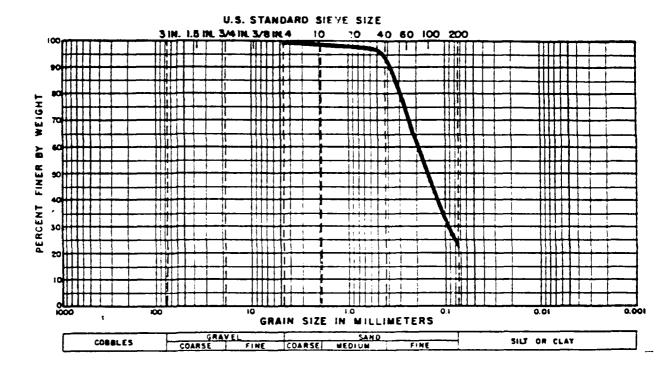


FIGURE A-2.3 LOG OF BORINGS JUL 23 1992

E CLEINO:

Dames & Mooi





BORING NO.: B-2 SAMPLE NO.: 3

BORING NO.: B-2 SAMPLE NO.: 3

DEPTH: 9.0 FEET

MOISTURE CONTENT: 21.9%

CLASSIFICATION: SM

DESCRIPTION: GRAY FINE TO MEDIUM SILTY SAND WITH TRACE COARSE GRAVEL (MEDIUM DENSE)

RECL

JUL 23 1982

STATE OF ILLING

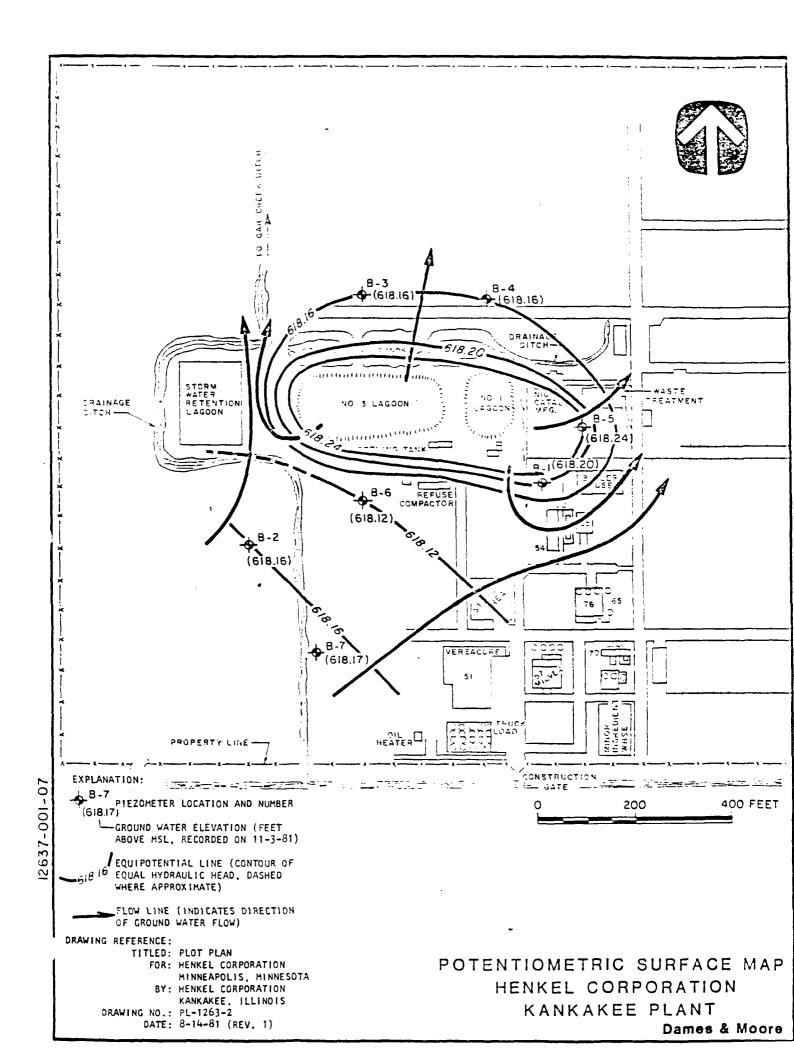
FIGURE A-3
GRAIN SIZE ANALYSIS

Dames & Moore

TABLE 2

MONITOR WELL DATA
HENKEL CORPORATION
KANKAKEE, ILLINOIS

Well Designation	Up-gradient Well	Dow	Down-gradient Wells		
	B-7	B -3	8-4	8-5	
Date Installed	11/03/81	10/13/81	10/13/81	11/02/81	
Well Diameter (in.)	2.0	2.0	2.0	2.0	
Screen Slot Size (in.)	0.010	0.010	0.010	0.010	
Ground Elevation (ft., msl)	625.5	621.3	623.2	624.7	
Top of PVC Casing Elevation (ft., msl)	627.79	623.79	626.15	626.74	
Screen Zone Elevations (ft., msl)					
Тор	612.0	616.0	616.7	618.0	
Bottom	602.5	601.0	601.7	603.5	
Screen Zone Depths (ft., below ground level)					
Тор	13.5	5.3	6.5	6.7	
Bottom	23.0	20.3	21.5	21.2	





Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

217/782-2445

REFERENCE NUMBER 🚊

Refer to: 09105507 -- Kankakee County

Kankakee/Henkel Corp.

November 15, 1982

Frank H. Beberdick Senior Utilities Engineer Henkel Corporation South Kensington Rd. Kankakee, IL 60901

Dear Mr. Beberdick:

This is in response to your letter of October 29, 1982 sent to Mr. Bharat Mathur of the Division of Air Pollution Control that was forwarded to this Division for reply. A state permit is needed if hazardous wastes generated are stored on site over 90 days. We cannot consider the data submitted to be an application as specific additional information and the required notice documents were not included.

Application forms and other information regarding permits are attached for your information and use in resubmitting.

You also asked for our comments on the data sent in advance of an anticipated Part B permit call-in under RCRA by USEPA. The technical data submitted is consistent with established RCRA standards. Your attention is directed to those portions of 40 CFR 264 that relate to General Facility Standards, Prepardeness and Prevention, Contingency and Emergency Procedures, Closure and Post Closure, Financial Requirements, Management of Tanks and Containers, and to the Interin Status Standards as described in the various sub-parts of 40 CFR 265.

You may also find the "Guide for Preparing RCRA Permit Applications" that is available from Region V, USEPA in Chicago to be helpful to you in preparation of your Part B Permit Application.

Sincerely,

Eugene P. Theios, Manager Disposal Alternatives Unit

Permit Section

Division of Land Pollution Control

EPT:mks:1/31

Attachments

cc: Region DAPC File





Henkel Corporation

South Kensington Road Nankakee, IL 60901 315/932-6751

October 29, 1982

Mr. Bharat Mathur, P.E. Manager, Permit Section Division of Air Pollution Control Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62706

RECEIVED

GOV 0 1 1982

Dear Mr. Mathur:

Re: 1) USEPA I.D. #ILD005215769

2) Illinois I.D. #09105507

EPA - JAPO - 1PFLD

Enclosed are prints of our proposed hazardous/special waste storage area for containerized wastes. Would you please review these prints in advance of the Part B permit call-in and determine if it will satisfy the various RCRA requirements? We would appreciate your comments as soon as possible because we would like to have this facility started and completed before the cold weather season.

It is our intent to store special wastes on the aggregate surface course and the hazardous wastes on the concrete pad.

FACILITY DRAWING OF CONTAINER STORAGE AREA

See facility drawing sheet 1 and sheet 2. Sheet 2 indicates the location of the containers on the concrete pad, separation and aisle spacing. While like wastes will be stored together, we do not consider this a safety or environmental problem. The reason for this is that there is not a reactive or ignitable incompatibility problem. See Table I for a list of the wastes to be stored.

CONTAINMENT SYSTEM CAPACITY

The capacity of the containment system is 3,890 gallons. See the sectional detail on the facility drawing (sheet 1) of the container storage area.

MANAGEMENT

The maximum number of containers in the storage area is 576. These will be 55 gallon capacity drums. The containers will be stacked 3 high.

CONTROL OF RUN-ON

The concrete pad elevation is higher than the surrounding ground level. Run-on is therefore controlled.

CONTAINMENT SYSTEM DRAINAGE

Any spill or precipitation will drain to the sump. See sectional detail on the facility drawing (sheet 1) for the slope of the storage areas.

REMOVAL OF LIQUIDS FROM COLLECTION SYSTEM

Spills and accumulated precipitation will drain to the sump. Spills or leakage will be analyzed and if found to be compatible with the plant pretreatment system, an 8" gate valve from the sump will be opened and the spill diverted to this pretreatment system. If a spill is found not to be compatible with the pretreatment system, it will be pumped to drums using a portable pump.

REQUIREMENT FOR BASE TO CONTAIN LIQUIDS

The concrete pad will be poured so that it is free from cracks or gaps. It will be sufficiently impervious to contain leaks, spills and accumulated precipitation until it is detected and removed. None of our waste material is sufficiently acid or cause to cause rapid deterioration of the proposed 9" thick base. Any deterioration over a long period of time would be readily apparent and would be repaired.

SECURITY OF STORAGE AREA

The storage area is to be enclosed with a 6' high - 9 gage wire chain link fence with locked access gate. Inspection of the area is to be on a 24-hour 7 day/week basis by pretreatment plant operator who is located in an adjacent building.

Sincerely yours,

Frank H. Beberdick

Senior Utilities Engineer

Fronk A Belonder

FHB/ss

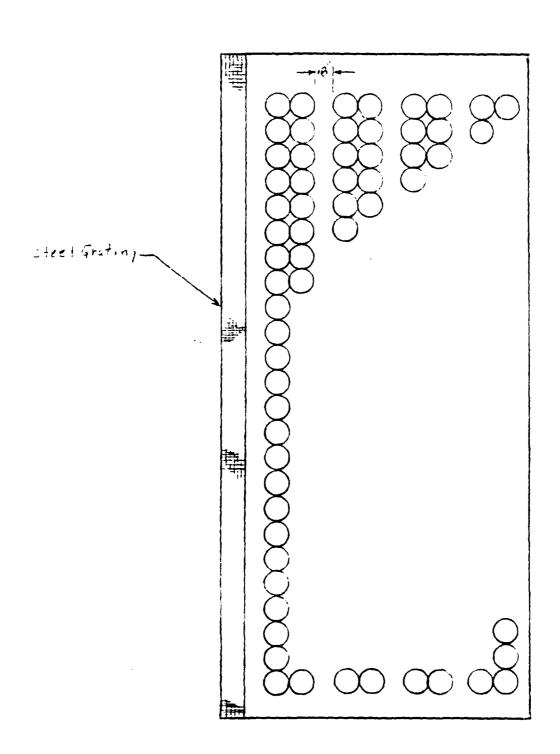
Enclosures:

- 1) Plot Plan, Dwg. No. PL-1263-1
- 2) Henkel West Area, Hazardous Waste Storage & Spill Containment Sheet No. 1
- 3) Sketch of Hazardous Storage Pad Drum Arrangement, Sheet No. 2

TABLE I

HAZARDOUS WASTES TO BE STORED

WAS	<u>TE</u>	STATE
1.	Quality Control Samples, proprionicacid, misc. solvents, resins, etc.	Solid
2.	Acidic Nitrobenzene	Liquid
3.	Acrylonitrile/Carbon - filters	Solid
4.	Starch Gel/Methanol	Solid
5.	Ethylene dichloride/Sterols/Vitamin E	Solid
6.	Methylene Chloride	Liquid
7.	Acrylic Resin/Xylene	Solid
8.	Solvent/Resins	Solid
9.	Vitamin E/Acetone/Clay	Solid
10.	Chloroform/Carbon - filters	Solid
11.	Misc. Solvents - Isopropanol, Toluene, Xylol, etc.	Liquid



24 X 8 ROW 3 X 3 HIGH = 576 PRUMS
ASSUME AVERACE DRUM = 53 EPILLONS
FOTAL CAPACITY = 30,528 GALLONS
SCALE, 1/8" = 1,0"

LPC REFERENCE SHEET (SAME FACILITY)

Facility Number:	0010550007 County: Kanhakee
Facility Name:	Henrel Corporation
USEPA Number:	ILDOCSBLE769
File Category:	State Parmits
FOR ADDITIONA	L INFORMATION SEE FILE CATEGORY: Map/Plan Sheet
<u>Date</u>	Brief Description of Documents
10/29/82	Plot Plan - Drawing No. PL-1263-1 Haz. Waste Stonge & Spill Containment Plan
	•

RECEIVED

MAY 12 1983

E.P.A. - D.L.P.C.

STATE OF ILLINOIS

MEMORANDU

DATE:

TO:

SUBJECT:

May 9, 1983

Division File

Craig J. Liska

FROM:

09105507 - Kankakee County - Kankakee/Henkel Corporation

Subpart "F" Inspection

This memo is written in conjunction with the Subpart "F" inspection conducted at the subject site on March 24, 1983.

Henkel Corp. is a manufacturer and distributor of specialty organic chemicals. The facility operates a waste water treatment system which includes two surface impoundments. Frank Beberdick was contacted at the time of this inspection. The facility's Part "A" application lists over 30 hazardous wastes that are introduced into the treatment system. Mr. Beberdick explained that those wastes were listed as a precautionary measure in the case of a spill or accident. He stated that under normal operation, oils and grease, soap cleaner and sewage would enter the treatment system. He also stated that all of the floor drains are connected to the system, however, no hazardous wastes are introduced under normal conditions. Mr. Beberdick stated that the corporate office is currently attempting to have the waste water in the impoundments delisted based on analysis. I informed Mr. Beberdick that Subpart "F" is applicable in this case until the waste is actually delisted, if in fact it does get delisted.

Dames and Moore conducted the hydrogeologic study and installed seven monitoring wells on-site. The hydrogeologic study, along with written sampling procedures, analytical procedures, test results, well construction details, etc. were fairly extensive. The only items missing were an evaluation of ground-water surface elevations and a regional hydrogeologic map. Mr. Beberdick was working on the evaluation of the ground-water surface elevations while I reviewed most of the records at the facility.

Boring logs indicate materials near the ground surface as fill (silty clay with some coarse gravel, sand and slag) followed by silty clay to a depth of 15 to 20 feet followed by the bedrock aquifer, in this case fractured Silurian Dolomite. The 15' well screens (one well B-7 has 10' screen) extend approximately four feet into the dolomite. The regional ground-water flow direction is to the north-northeast. Dames and Moore calculated the hydraulic gradient to be .0002. Dames and Moore potentiometric surface map shows a mound in the ground-water surface around the perimeter of the impoundments. Steve Martin of Dames and Moore stated that he has encountered this mounding affect at several other facilities

with surface impoundments. Steve stated that due to the low hydraulic gradient and the mounding affect he had a difficult time determining the ground-water flow direction. He stated that he utilized his information along with regional maps and other information from the State Geological Survey and is convinced that the ground-water flow is toward the north-northeast.

The one discrepency I noticed was in regards to the water elevations. Dames and Moore's report shows the water elevation in the downgradient well (B-5) 0.07 feet higher than the upgradient well (B-7). The measurements I obtained during the inspection revealed that the water elevation in B-7 was 0.2 feet lower than in B-3 and 0.4 feet lower than in B-4. While reviewing Henkel's quarterly sampling reports I observed that although the elevations were extremely close, B-7 always had the highest elevation. realize that both Dames and Moore and my results indicate that it is possible that B-7 is not the upgradient well, however, the mounding affect must be considered. Dames and Moore appear confident that the ground-water flow is towards the north-northeast and I tend to agree with their study, however, their data would be more convincing if one or two additional wells were constructed further north of the impoundments where the ground-water mounding would not affect the water elevations. I do not believe that it is imperative that additional wells be installed immediately, especially when the company is attempting to have the waste delisted. I would suggest that both the facility and the Agency keep a careful watch on any discrepencies in ground-water elevations.

CJL: pgb

cc: Mark Haney

Northern Region Craig J. Liska





September 16, 1983

Dauth Kensington Road Hankakee HL (60901 615 932-6751

REFERENCE NUMBER

RECEIVED

.

SEP 1 9 1983

TILL E.P.A. - D.C.P.C. STATE OF ILLINOIS

Mr. James K. Wiggins
Illinois Environmental Protection Agency
Environmental Protection Specialist
Field Operations Section
Division of Land Pollution Control
1701 South First Avenue
Maywood, Illinois 60153

RE: I. D. #ILD005215769

Dear Mr. Wiggins:

Enclosed is a copy of our revised Spill Prevention Control and Countermeasure Plan.

Yours truly,

HENKEL CORPORATION

Frank H. Beberdick

Senior Utilities Engineer

FHB/mf Enc:

SEP 2 2 1993

STATE OF ILL. OF

LEGEND

- XX Hazardous Waste Storage Area
- 3 Laboratory
- 51 Polyamide Resin Production
- 68 Vitamin E Production
- 71 Acrylic Resin Production
- 77 Nickel Catalyst
- 80 Semi-Works

I. NAME OF FACILITY

Henkel Corporation
South Kensington Road
P.O. Box 191
Kankakee, Illinois 60901

II. TYPE OF FACILITY

The Henkel Corporation Kankakee Plant is a manufacturer and distributor of speciality chemicals. The chemicals are produced from naturally occurring raw materials and are used in a wide variety of industries.

The Kankakee Plant produces mainly four major types of products, Polyamide Resins, Mineral Chemicals, Fatty Nitrogens and Fine Chemicals.

The first of these groups, Polyamide Resins, are produced by combining a Dimer or Monomer Fatty Acid with either a Functional or Polyfunctional Amine to form an Amide. The polyamide products manufactured at Kankakee are used in the ink, coatings, paints and adhesives industries.

The Fatty Nitrogens are produced either from nitriles or primary amines. The different products in this group are used in cosmetics, as corrosion inhibitors, in oil well drilling and many other applications. The bulk of these products are liquid and are shipped either in drums or tanktrucks.

The Mineral Chemicals are normally amines produced from fatty alcohols. These products are used primarily by food and mining industries for the purpose of extraction. All of these products are liquid and as such are shipped in drums and tanktrucks.

The final group of products is fine chemicals. There are two main products out of this group, Vitamin E and sterols. Vitamin E and sterols are co-products produced from waste distillate from the vegetable oil industry.

The plant utilizes approximately 50 acres out of 200 acres that is owned by Henkel. The remaining 150 acres are leased for farm land.

III. DATE OF INITIAL OPERATION

This plant began operations on October 1, 1948 as General Mills Chemicals. On September 1, 1977, the plant was purchased by Henkel Corporation.

IV. LOCATION

The plant is located in the southwest part of Kankakee, Illinois, which is in the northeast part of the State.

V. OWNER

HENKEL CORPORATION 4620 West 77th Street Minneapolis, Minnesota 55435

612/830-7831

VI. DESIGNATED EMERGENCY COORDINATORS

Gregory L. Rister
2 Briarcliff Court
Bourbonnais, Illinois 60914

Home Phone: 815/937-9343 Office Phone: 815/932-6751

VII. SPILL HISTORY

This plant has had no spills in the last 12 months.

VIII. SECONDARY CONTAINMENT PROVISIONS

Areas where oil, hazardous substances, or hazardous waste are stored or used, and the associated containment systems are as follows:

A. Sewer Systems

In the Kankakee Plant there are three sewer systems. These are the process sewer system, the sanitary sewer system, and the storm sewer system. All of these systems run through various parts of the plant.

The process sewer system is designed to carry drainage from the areas where chemicals are stored, used, and manufactured to the waste treatment facility.

The sanitary system runs from all buildings which have toilet facilities. This system also runs to the waste treatment facilities.

The storm sewers are designed to carry runoff from any rainstorms. This system runs to a series of settling ponds before it is pumped off to the city sewer system. If by any chance anything gets in this system, it is monitored by operators periodically as we have 24 hour coverage of this area, the fluid can be rerouted through the waste treatment facilities.

As the plant is being detailed a note will be made for each area as to which sewer systems are in each area.

B. Hazardous Waste Handling System

The Kankakee Plant has one type of waste handling system. This is a waste storage facility that stores hazardous wastes from various production areas, from the electric shop and from the quality control laboratory.

C. Description of Areas

1. Area No. 3 - Q.C. Labs

In this area, the testing of products and raw materials is handled. Many solvents, reagents, and analytical chemicals are used for these tests. All wastes are drummed and sent to the hazardous waste storage area.

2. Area No. 11 - Raw Material Tank Farm

This is a storage area for fuel oil, waste oil, and raw material feed for the Vitamin E process. There are no dikes, but there is ample sewer capacity to handle any spill. All drainage is to the process sewer system. There are 33 tanks in the area with capacities ranging from 7,500 gal. to 84,000 gal. All piping is outside between tanks and to various pumps for transfer of material to the area where it is used. Materials handled are the same as those stored.

3. Area No. 12 - Unloading for Area No. 11

This is the unloading area for Area No. 11. The materials handled are fuel cil, feed for the Vitamin E process, and a mineral acid. All drainage and spills are controlled to the process sewer system.

4. Area No. 17 - Wheeler Process

This area is for the distillation of low concentration Vitamin E to a higher concentration. The entire process is in the building with all drainage from the area to the process sewage system. The only materials handled in the process are heavy organics. There is some storage of these materials in seven tanks with capacities of 7,000 gals. to 24,000 gals.

5. Area No. 18 - Lab Storage

This area is just the storage area for all materials which are used in the lab. No appreciable amounts of any one chemical are kept on hand at any one time. The drainage from this building goes to the sanitary sewer system.

6. Area No. 19 - Polymer Plant

In this area fatty acids are dimerized. The process does involve the use of a mineral acid which is pumped into the area. There are three tanks with capacities of 1,750 gals. to 2,500 gals. These tanks hold only the fatty acid feed. The process is all inside, and all drainage is to the process sewer system.

7. Area No. 21 - Extraction

This process takes the raw material from Area No. 23 and extracts the tocopherol, the sterols and fatty acids from the stream. The materials unloaded, handled and stored the light solvents, alkali materials, and the raw material from Area No. 23. In the tank farm there are 5 tanks with capacities of 500 gals. to 20,000 gals. The farm has a dike with a capacity of 39,700 gals. This dike is 6 in thick concrete, and all dikes in the plant are constructed the same.

Also, the bulk storage tank for a mineral acid tank is located in this area with a capacity of 18,000 gals. and dike with a capacity of 18,300 gals. All drainage from this process and the tank farms is to the process sewer system.

8. Area No. 23 - Acid Washing

In this area the waste distillate from the vegetable oil industry is washed with a mineral acid to remove the ash before further treatment. The materials stored in the area are the distillate and the waste acid wash which is handled in the waste treatment plant. The tank capacities are 1,500 gals. to 15,000 gals. The drainage from the building is to the process and sanitary sewer system.

9. Area No. 22 - Polymer Bulk Storage

This is the tank storage area for Area No. 19. There are 12 tanks ranging from 2,250 gal. to 10,000 gal. capacities. All material is pumped over from another area. It is all fatty acid used in Area No. 19. All drainage is handled by an open trench which leads to the process sewer system.

10. Area No. 31 - Bulk Storage

This area is the tank farm for Area No. 42, which is #6 Converter. The materials which are handled are fatty acids, dimer amines, aldehydes, and ammonia. The 18 tanks range from 1,000 gals. to 25,000 gals. All piping is above ground and all drainage is to the process sewer.

11. Area No. 33 - Esterification RIA and RIB

This is the area where liquid resins are produced. The materials used in this area are polyfunctional amines and fatty acids. The process is conducted outside. Also in this area 11 tanks are used for storage of fatty alcohols and amine products. These materials are used and produced in other units. The tanks range from 1,000 gals. to 10,000 gals. All drainage is to the process sewer system.

12. Area No. 34 - Esterification

In this area liquid and solid resins are produced. In addition to the basic raw materials, two mineral acids and one organic acid are used which are piped in from another area. The process is all inside. All drainage from the area is to the process sewer system.

13. Area No. 36 - Quaternary Amine Storage

This area is the storage area for Area No. 37. It is diked, 32,390 gal., tank farm. Five tanks are in the farm with capacities of 8,400 gals. to 15,000 gals. All drainage is to the process sewer system. The materials handled include a light solvent, an alkali, a chlorinated hydrocarbon, and feed for the process.

14. Area No. 37 - Quaternary Amines

In this area quaternary amines are formed. The materials used are a solvent, an alkali, a chlorinated alkyl, and an amine. The process is outside and inside. No materials are stored in the area, but are transferred from Areas No. 33 and 36. All drainage is to the process sewer system.

15. Areas No. 40, 58, 84 & 85 - Warenouse

In this area drummed products, liquid and dry, are stored and shipped out. In the warehouse all drainage is to the process sewers. Outside in the area are storm sewers. Also many products are pumped to the area to be drummed, if liquid, or bagged, if solid.

16. Area No. 41 - Bulk Storage

In this area, 41 tanks with capacities of 6,000 gals. to 9,000 gals. are used to store various raw materials and products. The raw materials stored are fatty alcohols, nitriles and fatty nitrogens. The products are fatty nitrogens, amines and long chain alcohols. All of the raw materials are unloaded from rail cars. The products are loaded into rail cars or tanktrucks, with some being pumped to Area No. 40 for drumming.

17. Area No. 42 - Converter No. 6

In this area dimer acids and dimer amines are hydrogenated. A catalyst and a mineral acid are used in the process. The process is inside and all drainage is to the process sewers.

18. Area No. 44 - Converter No. 3

This process uses fatty alcohols and ammonia to form fatty amines. The materials used are pumped in from Area No. 33. The process is all outside and all drainage is to the process sewer system. The product is pumped either to Area No. 33 or No. 41 for storage and shipment.

19. Area No. 46 - Dimer Distillation

In this area dimers and dimer diamines are distilled to produce a higher quality product. There are five tanks, of 10,000 gals. each, used to store various feeds and products. The process takes place inside and outside and all drainage is to the process and sanitary sewer systems.

20. Area No. 51 - Versacure

This plant produces liquid polyamide resins and their solutions in various organic solvents. Polyamide resins are the reaction products of polymerized (dimerized) and monomeric fatty acids with alkylene polyamines. Storage tanks for the various materials used are located within a diked area. Tank capacities range from 1,000 gals. to 15,000 gals.

21. Area No. 57 - Milvex

This area has 11 tanks -- (450 to 15,000 gals.) used for the storage of feed materials. Two of the tanks which hold polyamines are in a diked area which has a capacity of 33,400 gals. The rest of the tanks are used for storage of dimers. The dimers and polyamines are combined to form solid polyamide resins. The process is located inside of a building and all drainage is to the process sewer system.

22. Area No. 60 - Boiler House

This area is where the process steam is produced. The only materials used are fuel oil and waste oil for firing the boilers. This material is pumped over from Area No. 11. All drainage is to the process sewer system.

23. Area No. 64 and No. 98 - Waste Treatment

This is the area where wastes from the process and sanitary sewers are neutralized, skimmed, biologically treated with activated sludge and clarified before the effluent is pumped to the Kankakee sewer system. In Area 98 the system consists of two 10,000 gal. tanks, two lagoons (750,000 gals. and 3,500,000 gals. respectively) and a 230,000 gal. final clarifier. In Area 64 there is a 8,500 gal. waste oil storage tank.

24. Area No. 66 - Koch Still

In this area Vitamin E is distilled to a more concentrated product. There are 2 tanks used for storage of feed and 6 tanks which are used to store different cuts from the process. These tanks have a capacity of 500 gals. to 2,000 gals. The process is inside. All drainage from the area is to the process sewers.

VIII. SECONDARY CONTAINMENT PROVISIONS (continued)

25. Area No. 68 - Vitamin E

In this area product from Area No. 69 is extracted, distilled and crystallized to make liquid and solid Vitamin E. Light solvents are used in the process. There are 10 tanks, of 1,000 gals. to 9,000 gals., in a diked tank farm of capacity 35,800 gals. These tanks all hold light hydrocarbons which are unloaded from tanktrucks directly. Also there are 27 small process tanks in the area ranging from 500 gals. to 1,000 gals. The process is all inside and all drainage is to the process sewer system. Runoff outside is to the storm sewers.

26. Area No. 69 - Methylarion

This process takes the product from Area No. 17 and methylates it to form Vitamin E. In addition to the feed, light solvents, an acid and an alkali are used in the process. In the diked tank farm area (16,000 gal. capacity), 5 tanks (1,500 gals. to 10,000 gals.), hold the light solvents. Twelve tanks are used to hold intermediate steps of the process ranging from 500 gals. to 2,000 gals. The process is inside and all drainage is to the process sewer system.

27. Area No. 71 - Acrylics

In this area acrylate monomers are combined with solvents to form acrylic coating materials. In the diked area of 46,650 gals, there are nine tanks of 2,000 gal, to 10,000 gal, capacities. The light solvents stored here are what is used in the process sewer system.

28. Areas No. 73 and 74 - Storage

In Areas 73 and 74 the feed materials for Area 34 are held. Area 73 is a diked area of 19,550 gals., with four tanks which hold the polyamines which are used. Area 74 has one tank that is diked, 19,550 gals. which has one tank of 4,000 gals. of a mineral acid. It also has seven tanks which hold the dimer amines needed. These tanks have capacities of 3,000 gals. to 10,000 gals. All drainage is to the process sewer system.

VIII. SECONDARY CONTAINMENT PROVISIONS (continued)

29. Area No. 76 - Converter No. 5

In this area dimer amines are produced from fatty acids, dimer nitrile, and ammonia. Also surfactants are produced from amines, and acrylate, and an alkali. There are 9 tanks which have capacities of 1,500 gals. to 10,000 gals. These store amines and feed products. Also there is one tank (8,500 gals) of an acrylate in a diked area of 11,100 gals. The process is inside and all drainage is to the process sewers.

30. Area No. 77 - Catalyst

In this area a metal alloy is treated with an alkali solution to form a catalyst. The alloy is brought in solid form and in drums. The alkali is pumped in from another area. The process is inside and all drainage is to the process sewer. The product is drummed in the area.

31. Area No. 80 - Semi-Works

This area contains pilot plant facilities for the plant. Many different processes are performed here, they are the same as different areas of the plant. It is totally enclosed and all drainage is to the process sewer system. Materials used are normally brought into the area in drums.

32. Area No. 82/76 - LIX

In this area dodecylphenol is reacted with paraformaldehyde to make an aldehyde which is then
reacted with hydrocylamine-sulfate to form an
oxime which is blended with kerosene and packaged.
Two solvents (toluene and hexane) are used.
Solvents and intermediate solutions are stored in
tanks of 2,000 gals. to 10,000 gal. capacities in
a diked tank farm. All of the process steps operate in closed systems.

33. Areas No. 86 and 87 - Storage

These areas are warehouses where drums of materials used in various products are stored. Also some products are stored here. All drains are to the process sewers.

VIII. SECONDARY CONTAINMENT PROVISIONS (continued)

D. Personnel Training

- 1. Each employee is given on-the-job training ranging from two to four weeks before he is allowed to work any job in the plant.
- 2. Monthly safety meetings are held with all employees to cover various safety items including the handling of hazardous materials.
- 3. Employees who unload tank wagons are instructed in spill prevention and spill cleanup measures.
- 4. Employees handling hazardous wastes are instructed in spill reporting requirements.

E. Evacuation Plan

- The plant is equipped with both area alarms and a general plant alarm. These alarms are used to notify plant personnel and rescue crews of fires, injuries, spills, bad weather and evacuation conditions.
- 2. All employees are aware of the two alarm systems and they have been instructed on what action to take when an alarm sounds.
- 3. All building exits are clearly marked.

IX. STORAGE SUMMARY

Material	Amount (gal.)
Fuel	526,500
Organic Solvents	307,060
Raw Material/Product	3,335,255

X. SPILL COUNTERMEASURE PROCEDURES

Although preventative systems are in operation, this plan is supplemented with the following strong spill contingency plan. The objective of this plan is threefold:

- -- Prevent hazardous releases and spills from occurring or reaching navigable waters.
- -- Minimize the extent of harm or damage resulting from the spill or release.
- -- Properly clean-up residues or contaminated materials resulting from the spill or release.

Discovery and Notification

- a. Anyone discovering a spill which could reach navigable waters or discovering an imminent or actual emergency situation which could threaten human health or the environment will immediately notify the Emergency Coordinator. The Emergency Coordinator will be in charge of containment and countermeasures.
- b. The following information must be given to the Emergency Coordinator:
 - 1. Location of spill.
 - 2. Material spilled and amount.
 - 3. Cause of spill.
 - 4. Measures being taken to contain or control spill.
 - 5. Is the spill continuing?
 - 6. Is the imminent danger to personnel or non-company owned property?

The Emergency Coordinator should contact plant management and Corporate Regulatory Affairs.

X. SPILL COUNTERMEASURE PROCEDURES (continued)

Discovery and Notification (continued)

c. Based on the above information, the Emergency Coordinator may, if considered necessary, activate internal alarm systems to notify employees. Upon identification of the hazards or extent of the spill, the Emergency Coordinator should notify any of the following outside agencies if their help is needed:

		Phone No.
i.	U.S. Environmental Protection Agency Regional Office	312/353-1346
2.	U.S. Coast Guard	-800/424-8802
3.	Illinois Environmental Protection Agency	217/782-0610
4.	Illinois Environmental Protection Agency	217/782-2113
5.	Department of Water Pollution Control, Kankakee	815/933-0446
6.	Kankakee Fire Department	815/933-0450
7.	Kankakee Police Department	815/933-0400

The Emergency Coordinator must determine the extent of possible hazards to human health or the environment outside of the plant area. If such hazards exist, evacuation of local areas may be needed and reports to Governmental emergency centers may be required.

Containment and Countermeasures

The person who discovers the spill or hazardous release should take whatever immediate action is necessary to control or contain the spill or release. Examples are closing a valve, switching off a pump or applying absorbent material. Any contaminated soil, water or other material resulting from the incident must be properly treated, stored or disposed.

X. SPILL COUNTERMEASURE PROCEDURES (continued)

Cleanup and Disposal

Cleanup of the spill or hazardous release should start as soon as possible after it has been contained and is safe to handle.

- a. Large non-flammable spills should be pumped to spare empty tanks, tankwagons, or drums. Cleanup of residual film with absorbent material.
- b. Large flammable spills should be pumped to tankwagons or drums and residues properly contained.
- c. Licensed waste haulers should be contacted for disposal of liquid and absorbent wastes. Manifest requirements must be met for shipments of hazardous spill residues.
- d. All equipment, pipes, storage areas must be checked for proper operation and compliance with environmental and safety regulations prior to resuming normal operation.

KI. SPILL EVENT REPORTS

a. Oil Spills

The Federal Regulations require a facility which discharges into navigable waters more than 1,000 gallons of oil in a single event or narmful quantities of oil in two events in a 12 month period to file a spill event report with the EPA Regional Administrator and the State Water Pollution Control Agency within 60 days, giving the following information:

- 1. Name of the facility.
- 2. Name of the owner.
- 3. Location of the facility.
- 4. Date and year of initial facility operation.
- 5. Maximum storage or handling capacity of the facility and normal daily throughput.
- 6. Description of the facility including maps, flow diagrams, and topographical maps.
- 7. A complete copy of the SPCC Plan with any amendments.
- 8. The cause(s) of such spill including a failure analysis of system or subsystem in which the failure occurred.
- The corrective action and/or countermeasure taken, including an adequate description of equipment repairs and/or replacement.
- 10. Additional preventive measures taken or contemplated to minimize the possibility of recurrence.
- 11. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event.

SPILL EVENT REPORTS (continued)

Hazardous Waste Spills or Releases b.

Federal Regulations require that when a facility which has a release, fire or explosion, resulting from treating, storing or disposing of hazardous waste, which could threaten human health or the environment outside the facility, the Emergency Coordinator must:

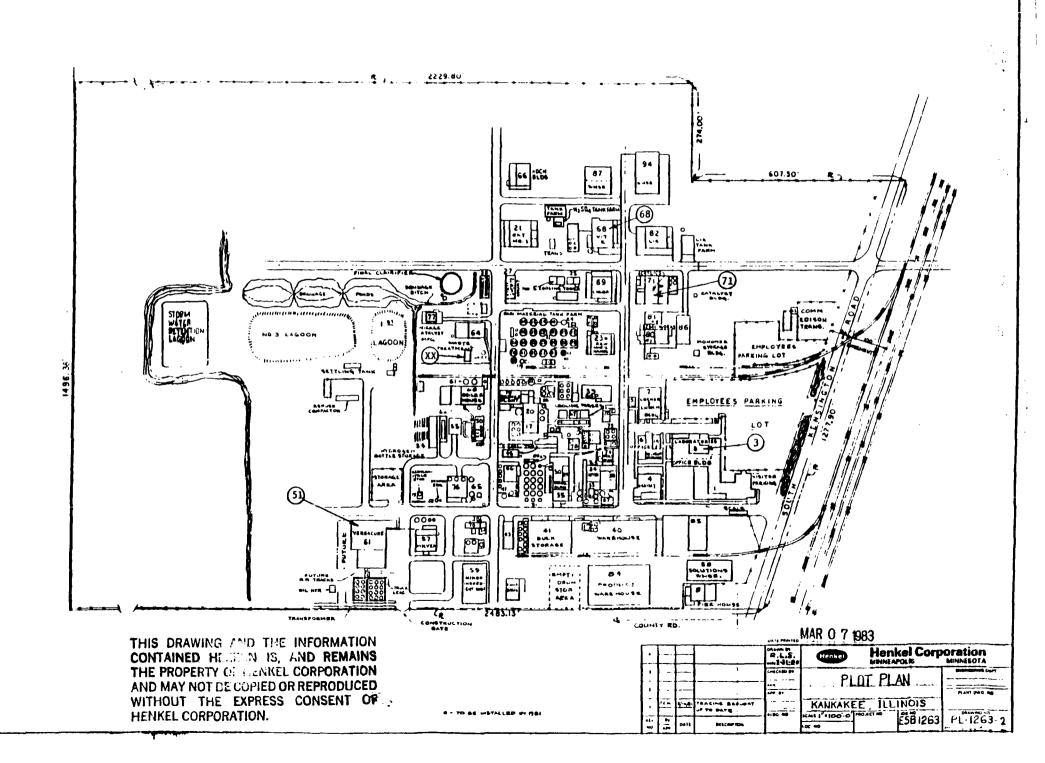
- -- if evacuation of local areas may be advisable, immediately notify appropriate local authorities.
- -- report the incident to the J.S. Coast Guard National Response Center (1-800-424-8802) giving the following information:
 - name and phone of the reporter
 - name and address of facility
 - time and type of incident (e.g. release, fire, explosion)
 - name and quantities of materials involved, if known
 - extent of injuries, if any
 - possible hazards to human health or environment outside the facility, if known.
- -- notify the U.S. EPA Regional Administrator and appropriate state or local authorities that no incompatible wastes will be treated, stored, or disposed with the released material until cleanup is completed and that emergency equipment is clean and fit-for-use. This notice must be given prior to commencing normal operations.
- -- record in the operating record the time, date and details of the incident.
- -- within 15 days, submit a written report to the U.S. EPA Regional Administrator, including:
 - name, address, phone of owner or operator

 - name, address, phone of facility
 date, time and type of incident (e.g., fire, explosion)
 - types and amounts of materials involved
 - extent of injuries, if any
 - assessment of actual and potential hazards to human health or environment, if known
 - amount and disposition of recovered materials.

XI. SPILL EVENT REPORTS (continued)

c. Spills of Hazardous Substances

Federal Regulations require the reporting of spills of hazardous substances into navigable waters if quantities equal to or exceeding the reportable quantity are released in any 24 hour period. Such notice should be given by phoning the U.S. Coast Guard National Response Center (1-800-424-8302).



SPCC PLAN

Contacts

Per	son/Agency		Phone
	Kankakee Fire Department		815/933-0495
	Kankakee Police Department		815/933-3321
	St. Mary's Hospital 500 W. Court Street Kankakee, Illinois 60901		815/937-2100
	Corporate Regulatory Affairs Dennis J. Vaugnn Henkel Technical Center 2010 E. Hennepin Minneapolis, Minnesota	55413	612/378-8662

Contacts

Person/Agency	Phone
Plant:	
Henkel Corporation South Kensington Road P.O. Box 191 Kankakee, Illinois 60901	815/932-6751
Plant Manager:	
A. J. Pranica	815/932-6751 815/939-0198 (Home)
Emergency Coordinator:	
Gregory L. Rister	815/932-6751 815/937-9343 (Home)
U.S. Environmental Protection Agency Region V 230 S. Dearborn St. Chicago, Illinois 50604	312/353-1346
Illinois Environmental Protection Agency Air Pollution Control 2200 Churchill Road Springfield, Illinois 62706	217/782-2113
Illinois Environmental Protection Agency Water Pollution Control 2200 Churchill Road Springfield, Illinois 62706	217/782-0610
Department of Water Pollution Control 385 E. Oak St. Kankakee, Illinois 60901	815/933-0446
Kankakee Emergency (Hazardous/Toxic) Response Team	815/933-0446
U.S. Coast Guard	L-800/424-8802
Chemical Transportation and Emergency Center (CHEMTREC) Washington, D.C.	/ L-800/424-9300

SPILL PREVENTION CONTROL

This Document Contries
CONFIDENTIAL PROPERTIAN
and/or FRACE STOCK
CONFIDENTIAL PROPERTIAN
AND TO THE STOCK
AND THE

AND

COUNTERMEASURE PLAN

FOR

HENKEL CORPORATION

South Kensington Road

Kankakee, Illinois 60901

CERTIFICATION

I hereby certify that I have examined this facility, and being familiar with the provisions of 40 CFR, Part 112 and 40 CFR, Parts 264 and 265, attest that this Spill Prevention Control and Countermeasure Plan has been prepared in accordance with good engineering practices.

Signature of Registered Professional Engineer

Printed Name of Professional Engineer

Dennis J. Vaughn

Date: Goil 60 /953 Registration No. 7319 State: Iowa

Henkel Corporation

2010 East Hennesmakenunge Minneapolis MN. 田田田 612/378-8800

REFERENCE NUMBER 💆

March 13, 1984 Vau-20-84

Mr. John Perry
Compliance Monitoring Section
Div. of Land Pollution Control
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
2200 Churchill Road
Springfield, IL 62706

Re: Henkel Corporation Kankakee, IL

EPA I.D.# ILD005215769

Dear Mr. Perry:

In response to your telephoned request on March 7, I am enclosing a photococo, of the letter which legal counsel for Henkel Corporation (Mr. Darier) sent or December 27, 1982 to Scott Phillips, Esq. of your Agency.

Although that letter addressed specifically the exclusion of our vastitewater treatment lagoons from the provisions of 35 III. Admin. Reg. Section 7725.247, the technical evaluations and determinations which we reported also support Henkel's related position on the exclusion of our lagoons from the resequirements of 35 III. Admin. Reg. Section 725.190 et seq. (See with Quailley's subsequent letter on February 2, 1984 to your Agency, c/o Mr. Hare

Henkel has closely studied (and continues to monitor) the operations of our plant, its waste generation practices, and the wastewater inflient into our lagoons. The results of these studies have been carefully correlated which the definition of "hazardous waste" under 35 III. Admin. Reg. Section 121...103 40 C.F.R. Section 261.3) and the waste mixtures specifically excludes fromore that definition. Henkel has reviewed the intent and criteria for these exclusions in their development at the federal level (see 46 FR 56582, Nov. 17, 1981), and subsequent adoption of equivalent provisions at the state level

Our resulting determinations are that (a) the waste mixture influents the those lagoons are not "hazardous wastes" within the meaning of Section 711.1103, 15 these lagoons therefore are not surface impoundments which treat statume or dispose of "hazardous wastes", and (c) accordingly, the operation of these lagoons does not subject Henkel to the requirements of Sections 725...197 et seq. (or Section 725.247).

RECT TO ME A MARCA E.P.A. - DLL 2.C. STATE OF RELLINOIS The assumed that, before being adopted, Henkel's conclusions in this matter have been very thoughtfully considered. Please let me know if you have any manualining questions on this subject.

very amounty yours,

HENIEL CORFORATION

Tanma J. Maught, P.

Tensintate Managen, Environmental Safety

125 11

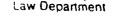
II: T. M. Daile, Esq., Henkel Corporation

RECEIVED

MAR 16 1984

E.P.A. — D.L.P.C. STATE OF ILLINOIS

612/830-7831



4620 West 77th Street Minneapolis, MN 55435



December 17, 1931

Illinois Environmental Protection Agement Division of Land Pollution Control 2200 Churchill Road Springfield, Illinois

Scott Phillips, Esq. Attention:

Staff Attorney, Enforcement

Re: Henkel Corporation

South Kensington Roads

P.O. Box 191

Kankakakee, Illiniis 60901

EPA ID No. ILDOCCITILL32

MAR 13 (884 IPA - BLP.C.

STATE OF ILLINOIS

Gentlemen:

This letter is in follow-up to ta telephone conversation which I had with Mr. Phillips on Noveember 19, 1982.

At the suggestion of Mr. Phillipps, a copy of this letter (with enclosures) is being sent to Mrr. Rama Chaturvedi, also of your Division. A further copy of this letter (only) is being sent to Mr. Thomas Golz at the EFI/Reegion V offices in Chicago, in offer of information which may be useful to that federal office in its review of any similar questions which may arise concerning facilities in states Michigan, Minnesota, and Ohio) which do not yet have Phase I or II authorities under RCRA

Please note the "CONFIDENTIALITY" claims which this Company asserts as to one of the attachments to this letter. This assertion is made primarily to assure the physical security of the above-identified plant facility, and the Company requests that your Agency receive and holf threat information in confidence. Henkel Corporation will rely upon the discretion of your Agency to appropriately limit the diastribution of the other information provided in and with this letter.

ISSUE: Whether or not certain wastewater treatment facilities at the Henkel Corporation: plant located at the above address are subject to RCRA "non-sudaden" liability insurance coverages under Title 40 C.F.R. 5 2655.147(b) [35 Ill. Admin. Reg. 6 725.247].

BACKGROUND: Confirming information previously provided by Henkel Corporation in its initial RCTRA Notification of Hazardous Waste Activity (EPA Form 8700-12, the subject plant produces specialty chemical compounds incliding dizer acids, polyamide resins, fatty nitrogen compounds, Viltamin E, phytosterols, and starch-based polymers.

TREATMENT SYSTEM - GENERAL. Sources of the wascamewater received and treated in this plant's treatment system incomblede those from chemical processes, boiler and cooling tower blow-downs, floor washings, loading/unloading area pad spills and washings, plant sanitary waste, and some water received through road and roof drains at the plant.

Wastewaters received in the system are subjected to primary treatment (oil skimming and pH adjustment, as necessarily), secondary activated sludge (aerobic) treatment in two largorns, extended aeration, final clarification and sludge dewitaming using a belt filter press. Attachment #1 is a simplified flow diagram of this activated sludge system. All fluid effluent form this treatment system is pumped to the Kankakee sewer systemm/POTW. No effluent from this system is discharged to surface tarmers, drainage ditches, or field tiles.

The volume of flow of treated wastewaters to the city is continuously recorded. Effluent sampling (BOD, sustemmded solids, pH, etc.) is also continuous, using flow proportional techniques. The wastewater treatment facility is manualed 24 hours-a-day, 7 days-a-week.

The capacity of the waste treatment system is 1.3500,000 gallons/day. However, normal flow to and through the system is about 1,000,000 gallons/day (1 MGD).

TREATMENT SYSTEM - SPECIFIC: The primary treatment entails the use of two 15,000 gallon tanks in which 75-90 percent of floating oils and greases are removed by skimming. Skimmings are heated and pumped into storage tanks for subsequent courning in natural gas-fired boilers at the plant.

The skimmed and pH-adjusted effluent then goes two surface Lagoon #1. This lagoon has a capacity of 750,000 callions and is served by four 50 hp. floating aerators.

From Lagoon #1, gravity flow then carries was makenes to Lagoon #3. The latter has a capacity of 3,500,000 parallons. The extended aeration in lagoon #3 is provided by eight 500 hp. floating aerators.

From Lagoon #3, the treated wastewater goes tras concrete clarifier for solids separation. Underflow solids are either sent back to Lagoon #1 to support aerobic activities there, or are sent to a belt filter press for water content redunction. Dewatered sludges are non-hazardous and are disposed to f by approved land filling. Overflow fluids from the clarmifier go via a lift station and force main to the Kankakee municipmal sewer system/POTW.

Attachment #2 provides in diagram form an overview of the plant grounds and wastewater treatment facility.

I.. 3. - 1.1.1.C.

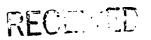
RCRA-REGULATE MATERIALS IN WASTEWATER: In the process wastewater which extens the treatment system at this plant are small quantities of acetone and methanol. Other RCRA-regulatable waste substances process in influent wastewaters, if at all, only at de minimus levels. Analytical testing conducted on influent wastewaters earlies this month, under atomic absorption methods failed, for example. to detect any heavy metals.

Both acetone ammd methanol occur in influent wastewater, after partial recoveries, as spent processing solvents. According to Company analytical records and solvent recovery data, acetone makes up approximately 38 gallons-per-day of total influent, while methannol enters the system at the rate of about 60 gallons-per-day. Rescalling that the normal flow to the system is around 1 MGD, the typical combined average contributions of waste acetone and methanil thus represent approximately 98 ppm of total daily influent.

Attachment #1 (further discussed below) reports the findings of wastewater samples analyses conducted for Henkel Corporation by an Illinois testing laboratory in December 1982. Those results do show some deviation from the combined influent norm of approximately 98 ppm, attached to "batch" discharges. The influent flows of acetone and methanol to the system are not equalized and, as indicated try these recent analyses, periodic peaking does occur, correspondents with production activities at the plant. However, as also insdicated by Attachment #3, by the solvent recovery records and by the general experience of Henkel Corporation, the testiodic higher concentrations of these two water-miscible salvents do not, and have not been known to closely approach those levels at which the combined wastewaters in this treatment saystem may pose a realistic prospect of ignitability per ECTRA criteria.

DISCUSSION: Frederal regulations at 40 C.F.R. § 261.31 [35 Ill. R&R § 721.111] identify spent acetone and methanol as non-halogenated solventus under the Hazardous Waste No. F003. Additional references too acetone (U002) and methanol (U154) also appear in 40 C.F.R. § 261.33(f) [35 Ill. Admin. Reg. § 721.133(f)]. In both latter references, acetone and methanol are identified as anazardous only because of their "ignitable" propensities.

However, at time low ppm quantities in which these waste materials are received along with other wastewater influents into this treatment system, that ignitable propensity is not present. Attachment #33 summarizes the recent ignitability testing conducted on the improsite waste samples pursuant to 40 C.F.R. § 261.21(a)(1) [15] Ill. Admin. Reg. § 721.121(a)(1)]. Even those wastewater samples which contained higher than the daily average levels of acetoms sand methanol would not ignite under the prescribed closes stup testing method. Indeed, if they could ignite, the waste would not comply with 40 C.F.R. § 265.229(a) [35 Ill. Admin. Reg. § 725.329(a)] which prohibits the placement



of ignitable wastes in surface impoundments (Lagrams) unless they are rendered non-ignitable either beforehand or namediately after.

Regulations at 40 C.F.R. § 261.21(a)(1) [35 IIII. Admin. Reg. § 721.121(a)(1)] implicitly exclude from any presummption of ignitability those aqueous solutions which contain "less than 24 percent alcohol by volume". The levels of methyl falcohol (methanol) in this treatment system do not approximate that indicated extreme level of concentration, i.e., the approximate equivalent of 240,000 ppm. Accordingly, the low-leevel presence of methanol in this wastewater would not subject time treatment system to RCRA regulation.

The levels of acetone in this system are also low. Analytical chemists with both Henkel Corporation and the Illinois testing company which made the flashpoint determinations reported on Attachment #3, estimate that acetone would have to be present at approximately one-half percent (0.5%) by volume before the composite wastewater would exhibit a flashpoint of 140°F, using the Pensky-Martens closed cup tester and prescribed ASTM test methodology; i.e., 5000 ppm. According to my information, that concentration of acetone has not been experienced in this treatment system nor is it anticipatable under plant or system operations.

In acclimated wastewater treatment systems sunch as that utilized at the subject plant, 90 percent biological removals of methanol have been observed. Similarly, 50 per seemt biological removals of acetone have been observed. Thus, they small quantities of these solvents which are not stripped by lagoon areation are subject to substantial biological regardation and a concurrent, further reduction of the ignitable scattentials of the composite wastewater in Lagoons #1 and #3.

ANALYSIS: 40 C.F.R. § 261.3 [35 Ill. Admir. Reg. § 721.103] provides the operational definition of "hazardois waste". Part 260, [Part 720], Appendix I (Overview of Subtitle II Regulations) provides the interpretative criteria for applying that definition.

In this case, because of the presence of small quantities of methanol and acetone, the wastewater influent to this facility's pretreatment system can be considered to be a "retiner [liquid] waste material". However, even though the wastewater in the treatment system is a "mixture of a solid waste and a hazardous waste that is listed in Subpart D", the "resultant mixture no longer exhibits any characteristics of hazardous waste identified in Subpart C". Accordingly, the wastewater mixture in these lagoons is not and should not be considered to be a hazardous waste for the purposes of RCRA. Section 261.3 1) (2) (iii) i; no directly parallel State provision, but see your Section 721.103(b)(3).

11 - 13 634

The spent methanol and acetone wastestreams produced at the subject Henkel facility are not principal wastestreams, and the lagoons and related treatment systems are not operated in any intended, principal part to handle spent solvents of this type. For economic reasons, the Company recovers and reuses a substantial portion of these solvents, and is actively pursuing ways in which to recover more. In this meantime, however, these methanol and acetone wastestreams are reasonably and efficiently managed by being discharged into the facility's wastewater treatment system. There is no indiscriminate discharge of these substances into wastewaters, so as to jeoardize compliances with discharge requirements under the Clean Water Act.

EPA "MIXTURES" RULE: On November 17, 1981, the federal EPA issued an Interim Final Rule concerning the identification and Listing of hazardous (and decidedly non-hazardous) processing waste mixtures. 46 Fed. Reg. 56582 et seg. In the preamble of that issuance, the EPA acknowledged that -

"Strict application of the mixture rule would cause to be hazardous waste a mixture of large volumes of non-hazardous wastewater and the relatively small amounts of listed hazardous wastes which are introduced into the wastewater as a result of normal manufacturing operations . . . In many cases, however, these relatively small amounts of listed hazardous wastes are likely to be greatly diluted in the wastewater, so that the resulting mixture is not hazardous . . . A presumption of hazardousness is not warranted in these situations." (Id. at Section II of preamble, pp. 56582-83).

Although that 1981 amendment to the federal mixtures rule specifically addressed (and exempted from the definition of "hazardous waste") low concentrations of spent solvents identified under the generic Hazardous Waste No's F001, F002, F004 and F005, Henkel Corporation respectfully submits that the same rationale and result (exclusion) should apply in this case to small wastewater concentrations of acetone and methanol, as listed under No. F003 in § 261.31 [35 Ill. Admin Reg. § 721.131]. To hold otherwise would produce an incongruous result in favor of "toxic" hazardous waste for which leaching from lagoons into groundwater is an appropriate concern.

Henkel Corporation notes that the State of Illinois has adopted in § 721.103(a) of its rules those Subpart C and D list-oriented criteria for determinations of "hazardous waste" which correspond with the version of federal Section 261.3 in effect before the EPA amendments on November 17, 1981. Whether the EPA's amendments in November 1981 were considered for adotion by the State but conscientiously rejected, or whether other factors precluded their implementation in Illinois, we do not know. However, unless your Agency concurs with the determinations of Henkel Corporation in this case, the "unintended result" foreseen

RECL

by the EPA under the preticus version of its § 261.3 could arise; i.e., "some waste mixtures being considered hazardous wastes which do not pose substantial hazard to human health or the new environment because they importain only very small amounts of listed hazardous chemicalst". It at Section I of preamble, p. 56582.

CONCLUSION: For all of the foregoing reasons, Henkel Corporation respectfully submits that, because of the small influent volumes of acetors and methanol and the determined absence of a hazard of ignitability relative to the composite wastewater, neither of wastewater transment lagoons operated at the subject plant should be considered by your agency to be a "surface impoundment . . . which is imsed to manage hazardous waste" (40 C.F.R. § 265.147(b) 135 Ill. Admin. Reg. § 725.147(b)] so as to require the Company is acquire and maintain "non-sudden" liability insurance relative to this operation.

We trust that your known will agree with the conclusion just stated. However, in the event that you may disagree and advise us of the bases for your differing conclusion, Henkel Corporation requests a remaschable amount of time following your notice in that regard to respond or acquire such insurance.

Please direct any presentions which you may have concerning this letter or its enchanges to my attention at the address above. (My direct telegraphe number is 612/830-7982). If you desire any additional fectual information concerning the subject treatment facility or conner facet of this matter, please also advise.

Very truly yours,

HENKEL CORPORATION

Thomas M. Dailey

Attorney

TMD/mn

Enclosures

Certified Mail - Return Receipt Requested

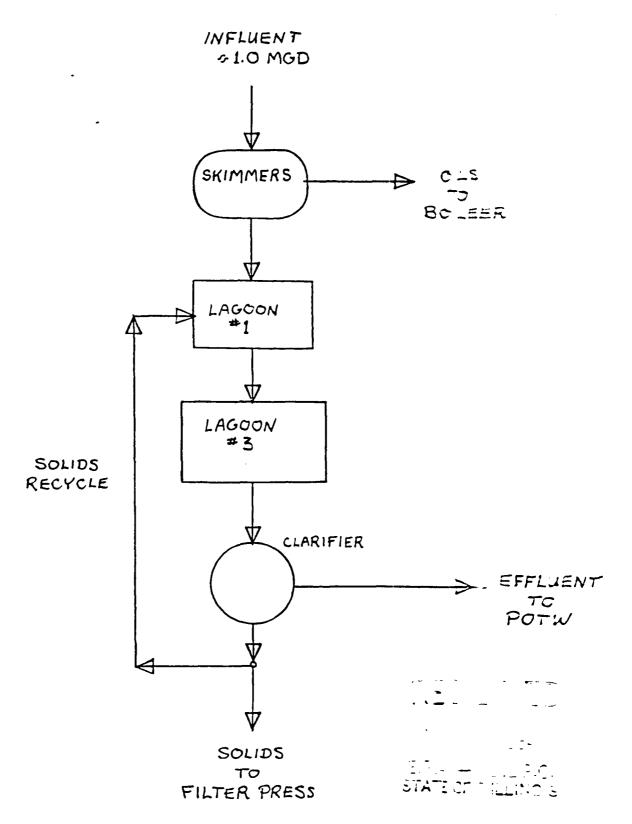
al/PP

STATE OF ILLINOIS

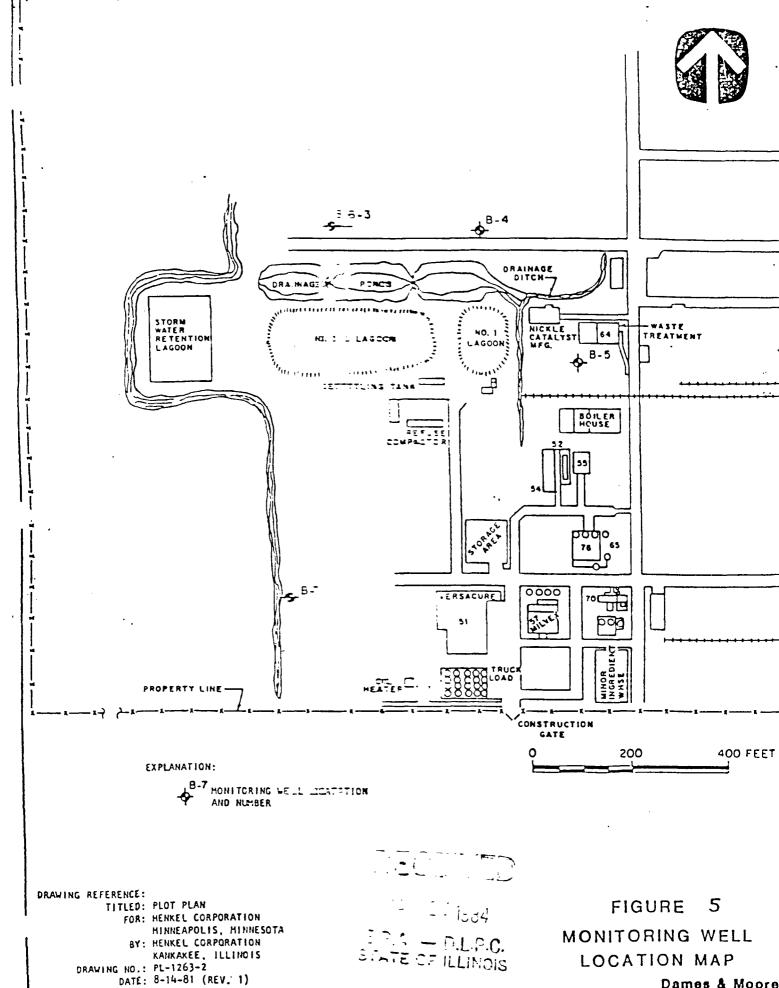
Mr. Rama Chaturve - Ill./EPA
Mr. Thomas Golz - IPA/Region V

D. J. Vaughn, P.E. - Henkel (HTC) / Environmental-Safety

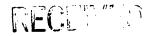
ATTACHMENT 1 KANKAKEE WASTEWATER TREATMENT SYSTEM



D.J.V.



Dames & Moore



ANALYSES OF PROCESS WASTEWATER

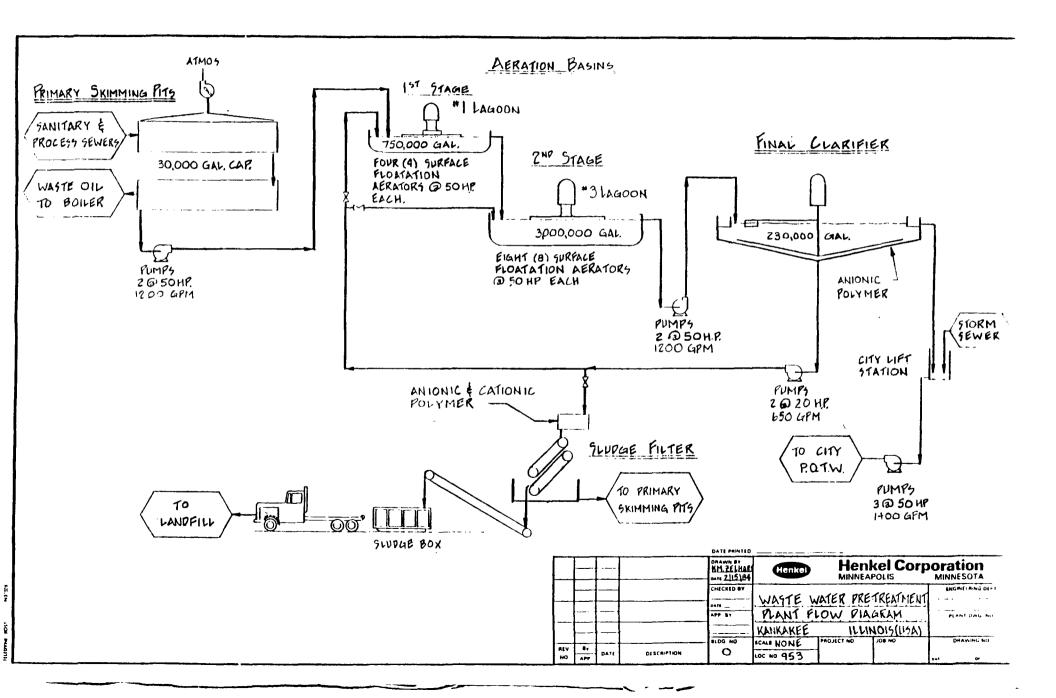
Thu 10 1934

December 1982

EPA - DIFF. STATE OF ILLINOIS

Date of Sample	Sample Location	Flashpoi (Composite		Concentra <u>Methano</u>		Concentration Acetone
12/03/82	Inlet - Primary Treatment (skimmers)	Greater tha	n 212 ⁰ F.	79 mg/lit	er	230 mg/liter
12/03/82	Outlet - Primary Treatment (skimmers)	Greater tha	in 212 ⁰ F.	39 mg/lit	er	215 mg/liter
12/03/82	Inlet - Lagoon #3	Greater tha	n 212 ⁰ F.	48 mg/lit	er	76 mg/liter
12/15/82	Outlet - Primary Treatment (skimmers)	Greater tha	n 212 ⁰ F.	Less than	10mg/liter	61 mg/liter
12/15/82	Mid-Lagoon #1 (Dip Sample)	Greater tha	n 212 ^o F.	Less than	10mg/liter	45 mg/liter
12/15/82	Mid-Lagoon #3 (Dip Sample)	Greater tha	n 212 ⁰ F.	Less than	10mg/liter	50 mg/liter
12/15/82	Outlet - Treated effluent to city POTW	Greater tha	n 212 ⁰ F.	Less than	10mg/liter	53 mg/liter
	Sample Averages:	Greater tha	n 212 ^O F.	Less than	29.5 mg/liter	104.28 mg/liter

^{*}Pensky-Martens Closed Cup Tester; prescribed ASTM Standard Testing Method



Facility Name: HENKEL CORP. ISEPA #: TUDOCS 215769 IEPA #. 0910

production of the second control of the seco		,				,						The second secon
Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analy- sis	USEPA Haz Waste	On 8700 -12	On 3510 -3 *	R	Annu et. 1 8 <u>6</u>	for	Amount on Site	Rate of Gener- ation	Last Mani- fested Ship- ment	Disposition
LABORATORY WASTE	MISCELLADEOUS ADALYSES	4/33/82	D001	Y	Υ	4	7	γ	BORUMS	3 DRUMS/	2/\s/88	LWD, INC. CALVERY CITY, KY. INCINERATION
ACIDIC Acetomity 12 NITROBERTEDE	MISCELLANEOUS ANALYSES	5/29/86	F004	4	۲	۲	۲	۲	4 prums	10 DRUMS/	14/87	1
ACRYLIC WASTE	ACRYLIC PRODUCTION	w/28/85	D001	4	4	Y	Υ	Y	3 PRumb	HORUMS/	2/15/88	!
SOLVENTS AND RESIN WASTE	RESIN PRODUCTION	1/4/86	D001	4	7	4	7	7	Sprums	5.5 DRUMS/	2/15/8 <u>8</u>	ENC
WASTE SCOTUM	ADHESIVE PRODUCTION	~\∂&\&c	D002	7	7	4	7	4	1 DRUM	S DRUMS/	179/87	M 2
VITAMIN E WASTE	VITAMIN E PRODUCTION (METHYLATION)	1/23/86	D001	Υ	4	4	4	4	II DRUMS	10,5 Daumo/	2/15/88	S
WASTE SOLVENT	LABORATORIES	6/28/B1	F003	۲	4	4	7	4	3 DRUMS	27 DRUMS/	ə/r <i>=</i> /હ	m
NOW- SPENT NICKEL CATALYST	REPRODUCED NICKEL CATALYST	9/2/82	Duoi	4	7	4	۲	4	эсыё	JORUMS/	11/2/87	\ \tag{\tag{\tag{\tag{\tag{\tag{\tag{
CONCENTRATED	PRODUCTION	5/87	0002	4	7	4	4	4	None	CHL2/48.	2/17/68 	SHERRERYSLLE, IL
7.PR 2 8 19	88											INCINERATION

^{*} All EntolPCsponses must be explained in the narrative.

Facility Name: HENKEL CORP.

USEPA #: ILITOOSDISTICA IEPA #: 09

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	(For waste gen. on	Date of Last Analy- sis	USEPA Haz Waste #	8700 -12	3510 -3	On Rr 8 7	Annu t. f	or	Amount on Site	Rate of Gener- ation	Last Mani- fested Ship- ment	Disposition
Non-H	AZARDOUS C	D P €C.T	2	W) A (J T W						
RESIN WASTER	VITAMIN E PRODUCTION	7/2/85	Na	Na.	1) A	NΑ	24	NA	70C LES	HER MO.		KANKAKEE
MENT SLUBGE	TaiarminT	11/2/84	NA	NA	N _B	NA	1/20	NA	19,040 LBS	PER MO.	J/22/88	MILFORD WASTE SYSTEM MILFORD IL.
WASTE OIL	POLYMER PRODUCTION	5/00/85	NA 	Na —	Na	Na —	NA	r)e	31,000 (20	si, se gals	2/19/88	BRESLUBE USA, INC.
NEWTRACIZED TIN LIQUOR THR		10/23/85	NA	NA	NA	NA	N/A	NA	30CC CALS	PER MO.	2/19/66	MILFORD
NATURAL BENTONITE CLAY	FELTER MATERIAL TO POLYMER PROD	19/87	12A	13a	Na 	NA	1-JA	12n	900 LBS	HE PER	2/19/88	LANDFILL LANDFILL
ħ.c.												
APR 8 198												

^{*} All "No" responses must be explained in the narrative.

3550007 8/88

SUMMARY

Henkel Corporation produces specialty chemical compounds including dimer acids, polyamide resins, fatty nitrogen compounds, Vitamin E, sterols and starch-based polymers. The plant is divided into a north and south end. The north end houses the production of fine chemicals including Vitamin E, sterols and food grade additives (vegetable oil derivatives). The south end is the location of production of industrial chemicals used in resins, coatings, plastics and adhesives.

HAZARDOUS WASTES GENERATED

Laboratory Waste - D001

- Generated from miscellaneous analyses
- Rate of generation: 3 drums/month
- Shipped off-site to LWD, Inc. (Calvert City, KY) for incineration
- 3 drums on site

Acidic Nitrobenzene - F004

- Generated from miscellaneous analyses
- Rate of generation: 10 drums/year
- Shipped to LWD
- 4 drums on site

Acrylic Waste - D001

- Generated from acrylic production
- Rate of generation: 4 drums/month
- Shipped to LWD
- 3 drums on site

Solvents and Resin Waste - D001

- Generated from Resin production
- Rate of generation: 5 1/2 drums/month
- Shipped to LWD
- 5 drums on site

Waste Sodium Aluminate - D002

- Generated from adhesive production
- Rate of generation: 5 drums/year
- Shipped to LWD
- l drum on site

Vitamin E Waste - D001

- Generated from Vitamin E production (methylation)
- Rate of generation: 10 1/2 drums/mo.
- Shipped to LWD
- 11 drums on site



Waste Solvents - F003/F005

- Generated from laboratories (quality control analyses)
- Rate of generation: 27 drums/year
- Shipped to LWD
- 3 drums on site

Non-Spent Nickel Catalyst - D001

- Generated as reproduced nickel catalyst
- Rate of generation: 2 drums/year
- Shipped to LWD
- None on site

<u>Concentrated Tin Liquor</u> - D002

- Generated from Vitamin E production
- Rate of generation: 816,865 gallons/year; 68,072 gallons/month
- Shipped off-site to M&T Chemicals (Carrollton, KY) or Mason Metals (Sherrerville, In) for incineration
- None on site

NON-HAZARDOUS SPECIAL WASTES

Resin Waste and Vitamin E

- Generated from Vitamin E production
- Rate of generation: 4860 cu. yds/month
- Shipped off-site to Kankakee Landfill
- 700 lbs on site

Wastewater Treatment Sludge

- Generated from wastewater treatment plant
- Rate of generation: 260 cu. yds/month
- Shipped off-site to Milford Waste Systems (Milford, IL)
- 19,000 lbs on site

Waste Oil

- Generated from polymer production
- Rate of generation: 31,300 gallons/month
- Shipped off-site to Breslube USA, Inc. (East Chicago, IN)
- 31,000 gallons on site

Neutralized Tin Liquor Tar

- Generated from Vitamin E production
- Rate of generation: 7700 gallons/month
- Shipped off-site to Milford Landfill
- 2000 gallons on site

Natural Bentonite Clay

- Generated as filter material in polymer production
- Rate of generation: 25,000 cu. yds/month
- Shipped off-site to Kankakee Landfill
- 900 lbs on site



ACTIVITY PROCESS UNITS

SO1 - Container Storage

This facility has a container storage area located near the west side of the plant (see diagram and photos 2 & 3). The storage pad is approximately 30 feet x 100 feet. The pad slopes toward the east and a spill catch drain is located in the center east area. The storage area is not closed and no evidence of leakage or contamination was observed on the pad. There were 35 drums present.

SO2 -Tank Storage

A hazardous waste tank storage area is located near the north side of the plant (see diagram and photo 1). This tank contains only Concentrated Tin Liquor (D002). The tank has a capacity of 8000 gallons, is 10 feet in diameter and is located approximately 400 yds from the property line. The diked area around the tank is in good condition and is capable of containing 100 percent of the volume of the tank. There was no waste in the tank at the time of the inspection. The tank has not been closed.

TO4 - Treatment Units

- 1) Wastewater Treatment Facility Wastewater is not hazardous (exempt from regulation under RCRA)
- 2) Thermal Treatment Facility Used oil is burned for fuel recovery; exempt from RCRA under Section 726.144.

APPARENT VIOLATIONS

- 722.111 Company has improperly classified two hazardous waste streams:

 Acidic Nitrobenzene D001 (should be F004)
 Waste Solvents D001 (should be F003/F005)
- 722.142 No exception report was filed for manifest #IL 1674168 (shipped 8/2/87 to M&T Chem. in Carrollton, KY)
- 725.115 Inspection schedule does not address the hazardous waste storage tank.
- 725.152 The facility's contingency plan does not contain an up-to-date list of emergency coordinators.
- 725.154 Contingency plan was not amended when the list of emergency coordinators changed.
- 725.173 The records and results of the hazardous waste storage tank inspections are not contained in the operating record.
- 725.295 Inspections of the hazardous waste storage tank are not being conducted.

TM:bh:2121B

Appendix A

Illinois Location Map



BRIDO			IND:		Route 115	LOG Date	4 7	_78		
SBI 25	BKIL		r Gar			Bored By		-/8 Legan- -		
39C-BR	STA.	~ 21	7+68			Checked By.	W.	H. Becl	k	
OUNTY Kankakee					Surface Water El.	87.1				-
Boring No. 2 (N. Abut.) Station 317+12 Offset 20' RT	Elevation	z	Qu 1/s.1	(%)	Groundwater El. at Completion After ——Hours	Dry	Elevation	Qu 1/s.f.	(%) 💌	
Ground Surface 99.2	0						_			
OK BR LOAM (ORGANIC) 96.7						• •	-25			
SOFT YL BR SANDY LAOM		3.	0.4	16						
LOOSE TAN FINE SAND	<u>-5</u>	5	0.2	10						
92.2		1					-30			
MEDIUM TAN SANDY LOAM		15	0.5 S	17						
	<u>-10</u>	 	1.0				\exists			
87.2	_	717	P	20	1		7			
STIFF GR SAND & GRAVEL		1					-35			
		24	2.0 P	111			-			
83.7	-15	36	 	14	·		\exists			
HARD WHITE LIMESTONE		1647 110"		10	·					
80.2		100 3"		10			-40			
•	-20						-45			

N-Standard Penetration Test-Hows per foot to drive 2" O.D. Split Speen Sampler 12" with 140# hammer falling 30".

Qu-Unconfined Compressive Strength -t/st

w - Water Content - percentage of even dry weight - %.

Type failure: B-Bulge failure

5 - Shear Failure E-Estimated Value

P - Ponetrane

eridge foundation eoring log

BRIDG		OUN				NG	LOG				
7		Over (115)ate		<u>4-6-</u>		
39C+BR				CCK			lored By			egan	····
No planta a	STA.	317.00	-	\neg			hecked By-		<u>_v, _</u>	. Bec	K
Station 318+27 Offset 44' RT	Ele,	2	- 1	⊗ 6	urface Water Froundwater El Completion After — Hour	ii. at	39.5 ———	Elevation	z	Qu t/s.t.	(%) *
naind Surface 100.5	- 0			1				_	1		1.
DK BR LOAM 98.5	=							- 25			
MEDIUM DK BR SANDY LOAM (ORGANIC) 96.5			.7 S	4				- <u>25</u>			
MEDIUM LT BR SANDY LOAM	-5		.9	14							
LOOSE TAN FINE SAND			.2					-30			
	-10	0	.8								
88.0			S	20				- <u>35</u>	4		
DENSE W & GR SAND & L.S. PIECES 86.5		64/ 11"	-	4				-			
STIFF GR SANDY LOAM TILL	-15	15	.2 B	11				-			
83.0	\exists	-			٠			-40			
HARD GR & W LIMESTONE PIEC	CES _	68	-	12				-			
	-20	100/ 5"		21				-			
								-4			

N-Standard Penetration Test — Nows per foot to drive 2" O.D. Solit Speen Sampler 12" with 140# hammer failing 30". Qu - Unconfined Compressive Strength - t/sf

w - Water Content - percentage of even dry weight - %.

Type failure:

B - Bulge Failure

S - Shear: Failure

E - Estimated Value

P - Penetrometer



BRIDGE FOUNDATION BORING LOG 6-27-80 BRIDGE Old U.S. 45 Over Date____ Minnie Creek-Drainage Ditch 3. S.B.I. 25 Bored By F.R. Pickard 39 BR R. Yell 158+24 STA. Checked By_ OUNTY_Kankakee <u>86.8</u> Surface Water El. Qu 1/s.t. Elevation Elevation (7.9) Boring No. 2 (S. Abut.) Z z Groundwater El. at Station 157+60 Completion 3 After ____ Hours 36' RT Offset_ 96.6 Ground Surface 0 HARD SILTY LOAM-LOAM TILL 49 12 9 73.1 BL. SANDY LOAM 50/ DENSE GREEN LIMESTONE Ω" 94.1 LOOSE BL. SANDY LOAM 8 92.1 MEDIUM LIGHT TAN FINE SAND 4 19 32 87.1 DENSE GRAY FINE SAND WITH SOME GRAVEL 45 18 16 82.1 HARD GRAY LOAM TILL 5.2 SOME SILT LAYERS 20 18 79.6 HARD SILTY LOAM-LOAM TILL 4.0 30 - 20 2.8 43/ 121 11

- Standard Penetration Test ows per foot to drive 2" D. Split Spoon Sampler 12" with 0# hammer falling 30".

Qu - Unconfined Compressive Strength - t/sf

w - Water Content - percentage of even dry weight - %

Type failure:

B - Bulge Failure

5 - Shear Failure

E - Estimated Value



Sh. 1 of 1 Sh.

BRIDG			IND		
5 T					5 Over Date 6-27-80
UTES.B.I. 25	<u> </u>			ek-Di	rainage Ditch Bored By F. R. Pickard
39 BR	STA	15	8+24		Checked By R. Yell
UNTYKankakee	E				Surface Water El. 86.8 =
Boring No.1 (N. Abut.) Station 158+71 Offset 30' LT	Elevation	Z	Qu 1/s.f	(°) *	Surface Water El. 90.0
ound Surface 98.7	0				DENSE LOAM TILL
BL SANDY LOAM					1.9
96.7					110 B 10
<u> </u>					- 25
LOOSE BL. SANDY LOAM			-		50/ 4.0+
		6	-	7	10" P 6
94.2	- 5				71.2
LOCSE BR. FINE SAND					
		3	_	10	DENSE GREEN GRAY I IMESTONE 6"
					DEMOE GIVEN GIOAT ETHESTOIRE
	-				-30
		_			
89.2		5	-	 7 	
	- 10				
MED. BR. SAND					
86.7		29		12	
00.7			İ		- 35
DENSE GR. SAND & SOME FI	NE		 		
GRAVEL		43		16	
	– 15	1			
82.7				1	
STIFF GR. SILTY CLAY WIT		13 7	2.0P	25	
THIN STIT LAYERS 81.7					
HARD GR. SILTY CLAY	_				- <u>40</u>
(LAKE DEPOSIT)		21	4.5 B	16	
79.2		 	<u> </u>	+	
HARD GR. SILTY CLAY LOAM	<u> </u>	-			
TILL	'		4.0	_	
76.7	-	33	P	9	-
		j			-45

N-Standard Penetration Test—
Blows per foot to drive 2"

C) D. Split Spoon Sampler 12" with
140# hammer falling 30".

Qu - Unconfined Compressive Strength - t/sf

w - Water Content - percentage of even dry weight = %.

Type failure:

B — Bulge Failure

S — Shear Failure

E — Estimated Value

May 14, 1990

Mr. Tim Murpny Illinois EPA 200 Churchill Road Box 9276 Springfield, IL 52794-9276

Dear Mr. Murphy:

Your May 11, 1990 request for boring information in Kankakee County to Mr. Bob Pickard, of our geotechnical staff, has been researched, and we have located four sets of bridge borings in or adjacent to Section 17, 18, 19 and 20, T30N R12E. These borings should give you the geological information that you desire.

If you have any questions about the boring logs, please contact Mr. Pickard at 815-434-0131.

Sincerely,

R. H. Blasius District Engineer

By: Edward M. Krysiak

District Materials Engineer

EPAN DO

Appendix B
Site 4-Mile Radius Map

